

Joseph Kluska  
November 6, 2020

Page 1

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

ADA ANGLEMEYER, et al., : CIVIL ACTION  
Plaintiffs, :  
 :  
vs. :  
 :  
NORTHAMPTON COUNTY, et :  
al., :  
Defendants. : No. 19-3714

- - -  
Friday, November 6, 2020  
- - -

Deposition of JOSEPH KLUSKA, taken  
pursuant to notice, via videoconference,  
before Michele L. Murphy, a Registered  
Professional Reporter and Notary Public, on  
the above date, beginning at approximately  
10:36 a.m.

- - -

STREHLOW & ASSOCIATES, INC.  
COURT REPORTERS - VIDEOGRAPHERS  
54 FRIENDS LANE, SUITE 116  
NEWTOWN, PENNSYLVANIA 18940  
(215) 504-4622

[www.strehlowcourtreporting.com](http://www.strehlowcourtreporting.com)

STREHLOW & ASSOCIATES, INC.  
(215) 504-4622

SUMMARY  
JUDGMENT  
EXHIBIT  
2

Joseph Kluska  
November 6, 2020

Page 2	Page 4
<p>1 APPEARANCES:</p> <p>2</p> <p>3 LEVIN &amp; ZEIGER</p> <p>4 By: BRIAN J. ZEIGER, ESQUIRE</p> <p>5 (Via Videoconference)</p> <p>6 1500 JFK Blvd., Suite 620</p> <p>7 Philadelphia, PA 19102</p> <p>8 215-546-0340</p> <p>9 zeiger@levinzeiger.com</p> <p>10 Representing the Plaintiffs</p> <p>11</p> <p>12 PA OFFICE OF ATTORNEY GENERAL</p> <p>13 By: KEVIN BRADFORD, ESQUIRE</p> <p>14 (Via Videoconference)</p> <p>15 1600 Arch Street, 3rd Floor</p> <p>16 Philadelphia, PA 19103</p> <p>17 215-560-2402</p> <p>18 kbradford@attorneygeneral.gov</p> <p>19 Representing the Defendants</p> <p>20</p> <p>21 ALSO PRESENT: Ada Anglemeyer</p> <p>22 Renae Kluska</p> <p>23 (Via Videoconference)</p> <p>24 ---</p>	<p>1 (It is hereby stipulated and</p> <p>2 agreed by and between counsel for all</p> <p>3 parties present that this deposition is</p> <p>4 being conducted by videoconference, that</p> <p>5 the court reporter, all counsel, and the</p> <p>6 witness are all in separate remote</p> <p>7 locations and participating via</p> <p>8 videoconference meeting under the control</p> <p>9 of Strehlow &amp; Associates Court Reporting,</p> <p>10 that the officer administering the oath</p> <p>11 to the witness need not be in the place</p> <p>12 of the deposition and the witness shall</p> <p>13 be sworn in remotely by the court</p> <p>14 reporter after confirming the witness'</p> <p>15 identity.</p> <p>16 It is further stipulated that</p> <p>17 exhibits may be marked by the attorney</p> <p>18 presenting the exhibit to the witness,</p> <p>19 and that a copy of any exhibit presented</p> <p>20 to a witness shall be e-mailed to or</p> <p>21 otherwise in possession of all counsel</p> <p>22 prior to any questioning of a witness</p> <p>23 regarding the exhibit in question.)</p> <p>24 (It is hereby stipulated and</p>
Page 3	Page 5
<p>1 INDEX</p> <p>2 WITNESS: Page</p> <p>3 Joseph Kluska</p> <p>4 By Mr. Bradford 5, 94</p> <p>5 By Mr. Zeiger 92</p> <p>6</p> <p>7</p> <p>8 EXHIBITS</p> <p>9 No. Description Ref.</p> <p>10 D-11 Medical records of Joseph</p> <p>11 Kluska 74</p> <p>12 ---</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>1 agreed by and between counsel that</p> <p>2 reading, signing, sealing, filing and</p> <p>3 certification are waived; and that all</p> <p>4 objections, except as to the form of</p> <p>5 questions, be reserved until the time of</p> <p>6 trial.)</p> <p>7 ---</p> <p>8 ...JOSEPH KLUSKA, after having</p> <p>9 been duly sworn, was examined and</p> <p>10 testified as follows:</p> <p>11 ---</p> <p>12 BY MR. BRADFORD:</p> <p>13 Q. Good morning, Mr. Kluska. My name</p> <p>14 is Kevin Bradford. We met very briefly just</p> <p>15 before we started here, but I work for the</p> <p>16 Attorney General's Office. I'm representing</p> <p>17 the state troopers that are named as</p> <p>18 defendants in this lawsuit. You are one of</p> <p>19 four plaintiffs.</p> <p>20 Today we're doing your deposition.</p> <p>21 I'm sure Brian explained to you what this is</p> <p>22 all about generally, so I'm not going to get</p> <p>23 too detailed in the instructions. I'm just</p> <p>24 going to ask you questions. I'm not here to</p>

2 (Pages 2 to 5)

STREHLOW & ASSOCIATES, INC.  
(215) 504-4622

Joseph Kluska  
November 6, 2020

Page 6

1 embarrass you, annoy you or make you  
2 uncomfortable, but given the claims that are  
3 alleged in this lawsuit, I have to ask these  
4 questions. Okay?  
5 A. Absolutely.  
6 Q. Okay. Were you present yesterday  
7 when we conducted two depositions yesterday of  
8 your father and mother-in-law?  
9 A. No, I was not.  
10 Q. Okay. All right. And who is in the  
11 room with you today? Is anyone there?  
12 A. My mother-in-law, my wife.  
13 Q. Okay. Your wife is Renae and your  
14 mother-in-law is Ada, correct?  
15 A. Yes.  
16 Q. Okay. So if you don't understand a  
17 question, you can't hear me, just let me know.  
18 Otherwise we're just going to get started.  
19 Okay?  
20 A. Yep.  
21 Q. How old are you?  
22 A. I am 46 years old.  
23 Q. And does that make you born in '74?  
24 A. '73.

Page 7

1 Q. '73, okay.  
2 A. Last couple days of the year.  
3 Q. Okay. And your height and weight?  
4 A. I'd say right now closer to 210. I  
5 put some weight on. 5'9", 210.  
6 Q. 5'9", 210. Were you lighter in  
7 February 2018?  
8 A. Absolutely.  
9 Q. Around what was your weight back  
10 then?  
11 A. I would probably say 185, 190.  
12 Q. You are married to Renae; is that  
13 right?  
14 A. Yes. Yes.  
15 Q. How long have you been married?  
16 A. Since June 1st of 2002.  
17 Q. Now, that was good. You were quick  
18 with that.  
19 A. I know, but --  
20 Q. I'd have to think about that.  
21 And do you have children?  
22 A. Yes.  
23 Q. How many?  
24 A. One stepson and one biological

Page 8

1 daughter.  
2 Q. Okay. Tell me about the stepson.  
3 What's his name and how old is he?  
4 A. His name is Tyeler Trinkley. He's  
5 23.  
6 Q. Okay. And your daughter?  
7 A. Kierra Kluska. She's 19.  
8 Q. And Tyeler is Renae's daughter from  
9 a different relationship?  
10 A. Son.  
11 Q. Son. Right. Sorry.  
12 A. Yes.  
13 Q. Where do you currently live?  
14 A. 102 Steep Hill Lane in Kunkletown,  
15 Pennsylvania 18058 with my wife.  
16 Q. Do either of your children live  
17 there?  
18 A. Not right now, but will be real  
19 soon.  
20 Q. Okay. And so currently it's you and  
21 your wife?  
22 A. Yep.  
23 Q. Does anyone else live there?  
24 A. No.

Page 9

1 Q. How long have you lived at that  
2 address? You can tell me years or if you --  
3 A. Currently just like two months.  
4 We're in the process of getting back in there.  
5 We lived there for years before.  
6 Q. You lived there for years before?  
7 A. Yeah.  
8 Q. Okay. So let's put it this way:  
9 When did you live there? Can you just  
10 summarize that for me somehow?  
11 A. We bought the house. I don't know  
12 exact dates. We bought it several years ago,  
13 lived there for a couple years, and then moved  
14 out and rented it for a couple years, and now  
15 we're in the process of going back in there.  
16 Q. Okay. And in between when you were  
17 living -- in February 2018, you were living at  
18 the -- you're at 340 Allentown Road right now,  
19 right?  
20 A. Old Allentown Road, yes.  
21 Q. Old Allentown Road, right. I  
22 recognize the background from yesterday.  
23 A. Yep.  
24 Q. So in February 2018, were you living

3 (Pages 6 to 9)

STREHLOW & ASSOCIATES, INC.  
(215) 504-4622

Joseph Kluska  
November 6, 2020

Page 10	Page 12
<p>1 at that address, the 340 Old Allentown Road?</p> <p>2 A. Yes, absolutely.</p> <p>3 Q. So that would have been in that</p> <p>4 in-between period --</p> <p>5 A. Yep.</p> <p>6 Q. -- you rented it out? Okay. Got</p> <p>7 it.</p> <p>8 During that in-between period, did</p> <p>9 you live anywhere else?</p> <p>10 A. No.</p> <p>11 Q. So approximately how long were you</p> <p>12 living at Old Allentown Road, if you can --</p> <p>13 A. I want to say around seven years. I</p> <p>14 don't know exact dates, but I'm going to say</p> <p>15 around seven years.</p> <p>16 Q. Okay. And so you moved back to the</p> <p>17 Kunkletown place. So basically seven years</p> <p>18 ago is when you moved in, minus two months, I</p> <p>19 guess, is when you moved in?</p> <p>20 A. Yeah, give or take. I don't know</p> <p>21 exact dates, but yeah.</p> <p>22 Q. Yes. And if you're estimating,</p> <p>23 that's fine. Just let us know.</p> <p>24 A. Yep.</p>	<p>1 Q. And how long did you work there?</p> <p>2 A. Probably about 11 years, maybe 12.</p> <p>3 Q. When did you stop working there?</p> <p>4 A. Through the pandemic.</p> <p>5 Q. So earlier this year?</p> <p>6 A. Yep.</p> <p>7 Q. And so you kind of segued into doing</p> <p>8 some construction on your own at this point?</p> <p>9 A. Yeah.</p> <p>10 Q. Is that full-time work or is that --</p> <p>11 A. I don't work non-stop anymore.</p> <p>12 Can't really -- no.</p> <p>13 Q. Is there any physical reason why you</p> <p>14 can't do that or is it just because of more of</p> <p>15 an economy situation here?</p> <p>16 A. No. It's physical.</p> <p>17 Q. Okay.</p> <p>18 A. I can't handle it every day like I</p> <p>19 used to.</p> <p>20 Q. All right. We'll get into that</p> <p>21 later.</p> <p>22 What was your salary when you were</p> <p>23 working at Comunale Construction? And you can</p> <p>24 tell me by year or --</p>
Page 11	Page 13
<p>1 Q. This isn't a quiz.</p> <p>2 Okay. So as of February 2018, you</p> <p>3 would have been living at Old Allentown Road</p> <p>4 for quite a while?</p> <p>5 A. Yeah.</p> <p>6 Q. Okay. Do you work?</p> <p>7 A. Yes.</p> <p>8 Q. What do you do for a living?</p> <p>9 A. Construction.</p> <p>10 Q. And who do you do that for?</p> <p>11 A. Right now I'm currently working for</p> <p>12 myself.</p> <p>13 Q. Okay. And did you work for a</p> <p>14 company before that?</p> <p>15 A. Yes.</p> <p>16 Q. Can you just take me back? I don't</p> <p>17 want to go back through your entire employment</p> <p>18 history. Let's start at like around 2016</p> <p>19 where you were working and then just take me</p> <p>20 through your --</p> <p>21 A. 2016 I worked for Comunale</p> <p>22 Construction.</p> <p>23 Q. How is that spelled?</p> <p>24 A. C-O-M-U-N-A-L-E Construction.</p>	<p>1 A. I was earning 28 bucks an hour when</p> <p>2 I stopped working for them.</p> <p>3 Q. 28 bucks an hour.</p> <p>4 A. 28 dollars. Sorry.</p> <p>5 Q. That's fine.</p> <p>6 Have you been arrested before?</p> <p>7 A. Yes.</p> <p>8 Q. And I understand that you were</p> <p>9 charged with marijuana from the February 2018</p> <p>10 event?</p> <p>11 A. Yes.</p> <p>12 Q. What was that, possession of</p> <p>13 marijuana in a pipe?</p> <p>14 A. Possession of small marijuana, yes.</p> <p>15 Q. And what was the outcome of those</p> <p>16 charges?</p> <p>17 A. I pled guilty and paid a fine. That</p> <p>18 ended it.</p> <p>19 Q. Have you been arrested and charged</p> <p>20 with anything since then?</p> <p>21 A. No.</p> <p>22 Q. Okay. Before then, did you have any</p> <p>23 criminal charges?</p> <p>24 A. DUIs.</p>

4 (Pages 10 to 13)

Joseph Kluska  
November 6, 2020

Page 14	Page 16
<p>1 Q. How many?</p> <p>2 A. Charged four, convicted three. Pled</p> <p>3 guilty to three, charged four times, but it</p> <p>4 got thrown out.</p> <p>5 Q. Okay. I have information that you</p> <p>6 had simple assault or disorderly conduct</p> <p>7 charges; is that correct?</p> <p>8 A. I'm not real sure. If it was, it</p> <p>9 was decades ago.</p> <p>10 Q. But if that information is in your</p> <p>11 record, you can't say that's wrong?</p> <p>12 A. I don't remember.</p> <p>13 Q. Okay. Do you remember the</p> <p>14 circumstances of any of those events?</p> <p>15 A. No.</p> <p>16 Q. So in February 2018, you were living</p> <p>17 at 340 Old Allentown Road. You and Renae had</p> <p>18 your own bedroom there?</p> <p>19 A. Yes.</p> <p>20 Q. And you weren't here yesterday. I</p> <p>21 have some familiarity with the house.</p> <p>22 A. That's fine.</p> <p>23 Q. So I can skip past some of this.</p> <p>24 I'm not going to ask you the same questions I</p>	<p>1 kids would stop in and stuff, yeah.</p> <p>2 Q. It wasn't like it wasn't normally</p> <p>3 locked or anything like that?</p> <p>4 A. Excuse me?</p> <p>5 Q. It wasn't normally locked or</p> <p>6 anything?</p> <p>7 A. Oh, yeah. That was our room. You</p> <p>8 couldn't just go in there when I wasn't there</p> <p>9 or nothing.</p> <p>10 Q. Okay. Would you lock it when you --</p> <p>11 if no one was there, would the door to the</p> <p>12 room be locked --</p> <p>13 A. Yes.</p> <p>14 Q. -- typically?</p> <p>15 A. Typically, yes.</p> <p>16 Q. Okay. But not always?</p> <p>17 A. I work a lot, so my wife -- I don't</p> <p>18 know.</p> <p>19 Q. Well, I'm going to get --</p> <p>20 A. That's fine. I understand. If I</p> <p>21 leave the room and nobody is home and me and</p> <p>22 my wife are here and I'm the last one to</p> <p>23 leave, then I lock the door, yes.</p> <p>24 Q. Okay. So it's fair to say there are</p>
Page 15	Page 17
<p>1 asked other people.</p> <p>2 But it's my understanding that</p> <p>3 there's a lower level to the house, which is</p> <p>4 where you're at right now, and then there's an</p> <p>5 upper level.</p> <p>6 I'm sorry?</p> <p>7 A. Yes.</p> <p>8 Q. And --</p> <p>9 A. The screen froze for a second there.</p> <p>10 Sorry.</p> <p>11 Q. That's okay. And that will happen</p> <p>12 occasionally.</p> <p>13 A. That's fine.</p> <p>14 Q. We'll just go back.</p> <p>15 So you and Renae were living in the</p> <p>16 upper level in a bedroom?</p> <p>17 A. Yes. Yes.</p> <p>18 Q. Did anyone else like sleep in that</p> <p>19 bedroom or is that your bedroom?</p> <p>20 A. No. That was me and my wife.</p> <p>21 That's it.</p> <p>22 Q. Okay. Would anyone else go in your</p> <p>23 room typically?</p> <p>24 A. Yes. People would -- I mean, my</p>	<p>1 probably times where it's unlocked?</p> <p>2 A. Maybe.</p> <p>3 Q. Who else was living at the house at</p> <p>4 that time?</p> <p>5 A. My brother-in-law Mark, my</p> <p>6 brother-in-law Jeff, my son Tyeler, my</p> <p>7 daughter Kierra, me, my wife, my mother-in-law</p> <p>8 Ada, my father-in-law Richard, and our family</p> <p>9 friend Clyde.</p> <p>10 Q. Does Jeff have a son?</p> <p>11 A. No.</p> <p>12 Q. Where would Tyeler stay? Did he</p> <p>13 have his own room?</p> <p>14 A. He had his own room, yes.</p> <p>15 Q. Was that also on the upper level --</p> <p>16 A. Yes.</p> <p>17 Q. -- of the house?</p> <p>18 A. Yes.</p> <p>19 Q. Would you enter that room?</p> <p>20 A. I've been in his room. I don't --</p> <p>21 yes, I've been in his room.</p> <p>22 Q. Okay. I mean, at the time -- he's</p> <p>23 now. He was about 20 or 21?</p> <p>24 A. Yes.</p>

5 (Pages 14 to 17)

Joseph Kluska  
November 6, 2020

Page 18	Page 20
<p>1 Q. Would you look around his room at 2 all when you were in there? 3 A. No. No. 4 Q. And same questions for Kierra. Did 5 she have her own room? 6 A. She had her own room, yes. 7 Q. And she would have been 16 or 17 at 8 that time? 9 A. Absolutely. 10 Q. Same thing. You would enter the 11 room, but you wouldn't look around? 12 A. Yeah. I've been in her bedroom, but 13 I don't snoop, no. 14 Q. Okay. You mentioned that your two 15 brother-in-laws are there, Mark and Jeff. Did 16 you know anything about them engaging in, I'll 17 say, illegal behavior -- 18 A. No. 19 Q. -- in the past? 20 A. No. 21 Q. Did you know anything about their 22 criminal histories whatsoever? 23 A. Not specifically, no. 24 Q. What did you generally know? And</p>	<p>1 A. Yeah. 2 Q. Is it the same? Okay. 3 Did you know if any of those issues 4 involved drug possession or distribution of 5 drugs? 6 A. I'm not real sure on that, no. It 7 was so long ago. I wasn't living with them at 8 that point. I don't know exactly what went 9 on. 10 Q. Were you ever present when either of 11 them had contact with the police, other than 12 February 23rd, 2018? 13 A. No, I was not. 14 Q. Okay. And when you said you had 15 been there, I guess -- if you spent about 16 seven years there, in early 2018 we'll 17 ballpark that you had been living there for 18 about, I don't know, four and a half, five 19 years? 20 A. Probably around there. I don't know 21 exact dates. That was a long time ago. 22 Somewhere around there, yeah. 23 Q. And I understand that, and we'll 24 just go with that number, with the</p>
Page 19	Page 21
<p>1 we'll start with Mark. 2 A. I don't know his past. 3 Q. Did you know if he had any criminal 4 history? 5 A. No. 6 Q. Okay. And same with Jeff, did you 7 know anything about his criminal history? 8 A. Not in particular, no. 9 Q. Did you know anything generally? 10 A. Yeah. I know there's been issues, 11 but I don't know what in particular, no. 12 Q. So it would be fair to say you know 13 he's had arrests in his past, but you don't 14 know anything beyond that? 15 A. No, I don't know. 16 Q. Okay. 17 A. No. I don't know specifics. I 18 really don't. 19 Q. Right. That's what I'm saying. You 20 knew he possibly had some arrests in the past, 21 but you don't know the specifics? Is that a 22 fair assessment of your knowledge of Jeffrey? 23 A. Absolutely. 24 Q. Okay. And same for Mark, is it --</p>	<p>1 understanding that's an estimate. 2 During that time, had Jeffrey always 3 lived there? 4 A. No. 5 Q. When did he live there? 6 A. I'm not sure of the exact dates. 7 Not as long as we have, so... 8 Q. Okay. So it's fair to say that when 9 you first moved back there, he was not living 10 there? 11 A. No. 12 Q. So the answer is yes, he was not 13 living there? 14 A. Yes, he -- no, he was not living 15 here. 16 Q. That was a bad question. Sorry. 17 A. You worded it weird. Yes, it's fair 18 to say that, no, he was not living here. 19 Q. Right. 20 MR. ZEIGER: Object to double 21 negatives. 22 MR. BRADFORD: Your objection 23 is noted. 24 BY MR. BRADFORD:</p>

6 (Pages 18 to 21)



Joseph Kluska  
November 6, 2020

Page 22

1 Q. Okay. And then at some point, he  
2 moved in?  
3 A. Yes.  
4 Q. And was that shortly before February  
5 23rd, 2018?  
6 A. I don't know the exact dates. I  
7 really don't. It was before that, but I don't  
8 know the exact dates. I don't remember.  
9 You're going back two and a half years. I  
10 don't know.  
11 Q. Okay. So I'm not asking for exact  
12 dates. I'm just saying was it a couple  
13 months, was it a couple years he had been  
14 living there, or you have no idea?  
15 A. I don't know if I'd say a couple  
16 years. Listen, I'm not around all the time.  
17 I work. I wouldn't say a couple years. Maybe  
18 a few years. I wouldn't -- like I said, we  
19 were here before he was. I know that for  
20 sure. He moved in here after we did.  
21 Q. Okay.  
22 A. But I definitely do not know a date.  
23 Q. Okay. How about Mark; was he there  
24 when you moved in?

Page 23

1 A. Yes.  
2 Q. And was he there throughout your  
3 time there?  
4 A. Yes.  
5 Q. He still lives there now, right?  
6 A. Yes.  
7 Q. Now, Mark had his own room?  
8 A. Yes.  
9 Q. Would you go into that room?  
10 A. Same as my children. I've been in  
11 his bedroom, but I don't -- it wasn't  
12 frequent. I don't check shit out. I don't...  
13 Q. So you might go in --  
14 A. I've been in his room.  
15 Q. Okay. But you didn't look around?  
16 A. No.  
17 Q. Okay. You don't know exactly what  
18 he had in there?  
19 A. No.  
20 Q. And it's my understanding from  
21 depositions yesterday that Jeffrey didn't have  
22 his own room per se, but he was staying in  
23 some open area on the lower level?  
24 A. Yes.

Page 24

1 Q. Does that jibe with your  
2 recollection?  
3 A. Yes.  
4 Q. Okay. Before February 23rd, 2018,  
5 had the police been to 340 Allentown Road when  
6 you were there?  
7 A. No.  
8 Q. Okay. Did you ever hear of them  
9 being there at a time that you weren't there?  
10 A. No.  
11 Q. Did anyone in the house as of  
12 February 23rd, 2018 express any negative  
13 feelings towards police or law enforcement?  
14 A. No.  
15 Q. Do you own any firearms?  
16 A. No.  
17 Q. Have you ever owned any firearms?  
18 A. No.  
19 Q. Have you ever fired a gun?  
20 A. No. I may have as a young child,  
21 like a .22 at a bird or something, but no, I  
22 don't -- no.  
23 Q. Okay. No problem. Just because I'm  
24 asking questions doesn't mean --

Page 25

1 A. Yeah. I don't have -- I don't own  
2 guns. I'm not into guns.  
3 Q. Okay. On February 23rd, 2018, it's  
4 my understanding that all the people you just  
5 told me who were living there were at the  
6 house?  
7 A. Yes.  
8 Q. And I think there was one additional  
9 person. Did your daughter Kierra have a  
10 boyfriend staying over?  
11 A. Yes, she did.  
12 Q. What was his name?  
13 A. John.  
14 Q. Do you know his last name?  
15 A. Shantz.  
16 Q. What was that? I didn't hear it.  
17 A. Shantz, S-H-A-N-T-Z, I believe.  
18 Q. How old was he in February 2018?  
19 A. I'm not sure. I think he was a  
20 senior in high school, so I don't know, 17,  
21 18.  
22 Q. I think it said he's 18 in some  
23 report somewhere.  
24 A. Yeah. I don't know his birthday. I

7 (Pages 22 to 25)

Joseph Kluska  
November 6, 2020

Page 26

1 don't know.

2 Q. Okay. Was he staying there  
3 frequently at that time?

4 A. Yeah. He would stay over.

5 Q. Are they still dating or no?

6 A. No.

7 Q. I'm going to show you a photograph  
8 of the property, so just hang tight here.

9 Okay. Mr. Kluska, I'm showing you  
10 what we marked yesterday as Exhibit D-1, and  
11 I'll represent to you that the green circle is  
12 the house that you're actually in right now.  
13 Does that seem to make sense to you?

14 A. Absolutely.

15 Q. Okay. And the red circle is a  
16 garage on the other side of, I guess, the  
17 driveway or paved area there?

18 A. Yes.

19 Q. Does that seem right? Okay.

20 A. (Witness shakes head in the  
21 affirmative.)

22 Q. I want to talk to you about this  
23 garage here.

24 A. Okay.

Page 28

1 A. No.

2 Q. Did you ever see any weapons in the  
3 garage?

4 A. No.

5 Q. At some point you became aware that  
6 in the weeks or months before February 23rd,  
7 2018 a confidential informant had bought meth  
8 off of Mark in that garage, or that's what the  
9 police allege?

10 A. Yeah. That's beyond me.

11 Q. Okay. You became aware of that  
12 allegation?

13 MR. ZEIGER: I'm going to  
14 object before you answer. So I'm going  
15 to object generally to relevance to the  
16 entire line of questioning about  
17 confidential informants. I'm going to  
18 instruct him to answer. Kevin, if you  
19 want me to object to each question for a  
20 cleaner record, I'm happy to do that.  
21 Some lawyers prefer I just make a general  
22 objection and let --

23 MR. BRADFORD: That's my  
24 preference.

Page 27

1 Q. What was in the garage, at least in  
2 February 2018?

3 A. Tools.

4 Q. Anything else?

5 A. No; tools.

6 Q. Did you keep anything in that  
7 garage?

8 A. No.

9 Q. How often would you go into that  
10 garage?

11 A. Here and there. I've been in there.

12 Q. Would you say occasionally or is it  
13 something you would --

14 A. Occasionally.

15 Q. And it's my understanding that Mark  
16 would spend a lot of time in there?

17 A. As far as I know. I worked all day  
18 every day, so I'm not here all the time.

19 Q. Would you see him in the garage or  
20 by the garage or you knew he was --

21 A. Well, I wouldn't go in there if he  
22 wasn't in there.

23 Q. Did you know if there were any  
24 weapons in the garage?

Page 29

1 MR. ZEIGER: Okay.

2 MR. BRADFORD: Your objection  
3 is noted.

4 MR. ZEIGER: Okay. You can  
5 answer, Joe.

6 BY MR. BRADFORD:

7 Q. So at some point you became aware  
8 that there were allegations that he had sold  
9 meth to a confidential informant?

10 A. Yeah. When they busted into my room  
11 and ripped down my bed, then I became aware of  
12 it.

13 Q. Okay. So before then, you had never  
14 had any reason to suspect that he was --

15 A. No.

16 Q. -- selling meth?

17 A. No.

18 Q. Okay. So that surprised you, that  
19 allegation? Is it fair to say that?

20 A. Yeah.

21 Q. Okay. I'm going to show you a  
22 couple other pictures here.

23 I'm showing you what we marked  
24 yesterday as Exhibit D-3. I'll represent to

8 (Pages 26 to 29)



Joseph Kluska  
November 6, 2020

Page 30	Page 32
<p>1 you that this is a photograph of a gun that 2 was found in the garage on February 23rd, 2018 3 by the local police or some law enforcement 4 agency. 5 Had you ever seen this gun -- did 6 you ever see this gun before February 23rd, 7 2018? 8 A. No. 9 Q. And the occasions you had been in 10 the garage, you didn't see this gun in the 11 garage? 12 A. No. 13 Q. Had you ever seen this scale that 14 was in the garage? All these photographs were 15 taken on that day. 16 A. No. 17 Q. This is Exhibit D-4 I'm showing you. 18 A. No. 19 Q. Did you ever see -- I'm showing you 20 now what's been marked as D-5 -- a box 21 containing empty vials? 22 A. No. 23 Q. Had you ever seen that before? 24 A. No. I told you, I don't spend -- I</p>	<p>1 A. All right, bud. 2 Q. All right. I'm showing you now D-6, 3 which is another photograph taken on February 4 23rd, 2018 in the garage. I'll represent to 5 you these are little Ziplock baggies. I'm 6 assuming the answer is the same, but have you 7 seen those before? 8 A. No. 9 Q. And, again, you understand just from 10 common knowledge or watching TV or something 11 like that that -- 12 A. Yes. 13 Q. -- drugs sometimes are sold in 14 little Ziplock bags? 15 A. Yes. 16 Q. Thank you. 17 Did Mark engage in any hobbies or 18 anything like that that he would use small 19 vials or small Ziplock bags for that you know 20 of? 21 A. I have no idea. 22 Q. Okay. When Mark was in the garage, 23 do you know what he was doing in there? 24 A. No. Hanging out, working on things,</p>
Page 31	Page 33
<p>1 haven't spent a lot of time over there. 2 Q. I'm just -- 3 A. That's fine. 4 Q. When you go in the garage, the 5 times -- I understand you didn't spend much 6 time there, right, and when you -- 7 A. Right. 8 Q. -- go there, you didn't really look 9 around or anything? You would just -- 10 A. No. 11 Q. -- go in there to talk to Mark or -- 12 A. No. Never seen anything like that 13 ever. 14 Q. You understand that certain drugs 15 are sold in containers like this, right, from 16 watching TV or something like that? 17 A. Sure. 18 Q. Okay. I'm going to show you one 19 more picture. Same thing, these were 20 photographs that were -- 21 A. Sorry. I'm real sorry. 22 (Background noise.) 23 All right. Kevin, is it? 24 Q. Yes.</p>	<p>1 fixing things. He fixed cars and stuff. No, 2 I don't -- like I said, I don't spend a lot of 3 time in there. 4 Q. And when you -- 5 A. Something is coming up on my screen 6 here. Almost time to restart. 7 MR. BRADFORD: Let's go off the 8 record. 9 (Discussion held off the 10 record.) 11 BY MR. BRADFORD: 12 Q. You said that you weren't there 13 much, but -- I don't want to mischaracterize 14 your testimony, but you wouldn't go to the 15 garage much, but you might go there to talk to 16 Mark because he was in there? 17 A. Just stop in maybe after work. 18 That's it. 19 Q. And, again, you didn't keep anything 20 in there, so you didn't -- 21 A. No. 22 Q. You weren't poking around in there? 23 A. No. 24 Q. Okay. Do you know if other people</p>

9 (Pages 30 to 33)

Joseph Kluska  
November 6, 2020

Page 34

1 would visit him there?  
2 A. Sure. There would be --  
3 Q. People who would visit the house?  
4 A. There would be people around,  
5 hanging out, fixing cars and stuff.  
6 Q. At least at that time, would it be  
7 unusual for someone who didn't live at the  
8 house, whether it's a friend, another family  
9 member or --  
10 A. I'm not real sure about that.  
11 Q. Okay. And there was a trailer  
12 really close to the garage. Do you remember  
13 that? I can pull this up.  
14 A. Several of them.  
15 Q. Was there a very large one at least  
16 in February 23rd, 2018?  
17 A. There's stuff all over out there.  
18 Yeah, there's tractor-trailers. There's  
19 several of them out there. Several.  
20 Q. All right. And would you go in any  
21 of those, anything that's like a trailer or  
22 almost like an RV or something?  
23 A. No. No. There's a tractor-trailer  
24 out there that I had some of my tools in.

Page 35

1 Q. All right. In February 2018 --  
2 well, we already established you never owned a  
3 gun. Did your wife own any firearms?  
4 A. Yeah. My wife had a gun.  
5 Q. How many guns or rifles or firearms  
6 did she have back then?  
7 A. As far as I know, just one.  
8 Q. Is it possible she had others and  
9 you just don't know?  
10 A. I don't think so.  
11 Q. Okay. What was the one that you  
12 knew about at least, what type of gun was  
13 that?  
14 A. I don't know. A little handgun she  
15 carried with her. I don't know guns.  
16 Q. Okay. And where was that typically  
17 kept?  
18 A. I believe she carried it in her  
19 purse.  
20 Q. Okay. And when she was not out,  
21 where was it kept?  
22 A. It's been on the headboard above the  
23 bed at nighttime.  
24 Q. And that was her decision to put it

Page 36

1 there?  
2 A. Yes.  
3 Q. Did she ever explain why it's right  
4 above the headboard?  
5 A. No. I never really asked her.  
6 Q. It wasn't really a concern to you?  
7 A. No. She carried a gun. She carried  
8 a gun.  
9 Q. Is it fair to say she carried a gun  
10 wherever she went?  
11 A. Yeah. At that time, yeah.  
12 Q. So that would be the only gun that  
13 would be in your room at that time?  
14 A. Yes.  
15 Q. What about the rest of the house;  
16 were there guns in the rest of the house?  
17 A. Not that you would see, no. I mean,  
18 my daughter had a little gun that she kept in  
19 her room.  
20 Q. Okay.  
21 A. But I don't -- I believe my  
22 father-in-law had a gun safe, but I was never  
23 in there. I don't know exactly -- like I  
24 said, I'm not a gun guy, so I don't know.

Page 37

1 Q. Okay. So Kierra had a gun and she  
2 kept it in her room. What about Tyeler?  
3 A. Yeah. I know he had a gun or two,  
4 but, again, I couldn't go about describing  
5 them or even saying what they were called or  
6 anything.  
7 Q. Okay. Do you know where he would  
8 typically keep them?  
9 A. In his room. He had a gun safe as  
10 well.  
11 Q. Okay. Was that locked?  
12 A. I don't know. I was never in it.  
13 Q. Kierra's gun, what type of gun was  
14 it? I understand you don't know models.  
15 A. It was pink. I just know it was  
16 pink. I don't --  
17 Q. Was it like a rifle or is it like a  
18 handgun?  
19 A. No. It was a rifle, like a --  
20 Q. Longer gun?  
21 A. Yeah, it's a longer gun.  
22 Q. Okay. And Richard testified he had  
23 a gun safe. Had you ever seen the contents of  
24 that safe?

10 (Pages 34 to 37)

Joseph Kluska  
November 6, 2020

Page 38	Page 40
<p>1 A. No.</p> <p>2 Q. Were you aware that there was a gun</p> <p>3 in the China cabinet drawer behind you at that</p> <p>4 time?</p> <p>5 A. No.</p> <p>6 Q. Okay. Do you know whether or not</p> <p>7 Mark had any guns in his room?</p> <p>8 A. No.</p> <p>9 Q. Do you know if at that time Jeffrey</p> <p>10 had any guns in the house?</p> <p>11 A. No.</p> <p>12 Q. And it's your testimony that if you</p> <p>13 were walking around the house, you wouldn't</p> <p>14 see a gun out in the open anywhere?</p> <p>15 A. No. Like I said, at night when we</p> <p>16 went to bed, my wife's would be on the</p> <p>17 headboard and that was it.</p> <p>18 Q. If someone is going out to like hunt</p> <p>19 or --</p> <p>20 A. If she would leave, she took hers</p> <p>21 with her.</p> <p>22 Q. Okay. Let's move to February 23rd,</p> <p>23 2018. I want to talk about exactly what</p> <p>24 happened that day from your perspective.</p>	<p>1 zip tie where he cuffed me at behind my back,</p> <p>2 lifted me up in the air and slammed me on the</p> <p>3 floor, and I'm still like half asleep, not</p> <p>4 knowing what's going on. Picks me up, sets</p> <p>5 me -- I have a table and two chairs in my</p> <p>6 bedroom. Sets me on the chair and wouldn't</p> <p>7 explain anything. Just shut up, just shut up,</p> <p>8 just shut up. So we sat in my room for a</p> <p>9 while, and there was ruckus going on</p> <p>10 everywhere, and then eventually they brought</p> <p>11 us all downstairs and sat us all in one room,</p> <p>12 all cuffed, took the dogs out of the house, at</p> <p>13 which time the, I guess it would be called,</p> <p>14 entry team left and then detectives and stuff</p> <p>15 came in and started questioning and looking</p> <p>16 around. That's when they started searching</p> <p>17 the whole damn place.</p> <p>18 Q. Okay. And that's a good summary.</p> <p>19 Thanks. So I'm just going to break that down</p> <p>20 a little bit. Okay?</p> <p>21 A. Yep.</p> <p>22 Q. So is it fair to say that you didn't</p> <p>23 know -- you were asleep -- when did you first</p> <p>24 wake up? When the door opened?</p>
Page 39	Page 41
<p>1 So as established through your</p> <p>2 complaint and everything, the State Police</p> <p>3 showed up as part of conducting a search</p> <p>4 warrant to search the house and then it's</p> <p>5 handed over to local authorities at some</p> <p>6 point. Do you remember that?</p> <p>7 A. Yep.</p> <p>8 Q. All right. So I think the easiest</p> <p>9 way to do this, if you just take me through</p> <p>10 that morning from, I guess, the moment you</p> <p>11 woke up early.</p> <p>12 A. Yeah. The moment I was woken up.</p> <p>13 Q. Right. Right.</p> <p>14 A. Yeah. They busted in through the</p> <p>15 outside door into my bedroom and literally</p> <p>16 scared the bejesus out of me, and one of them</p> <p>17 jumped on my bed, had me roll over and put my</p> <p>18 hands up, which I did, and then they cuffed</p> <p>19 me. And he had a gun in his hand and cuffed</p> <p>20 me behind my back, and then after cuffing me,</p> <p>21 I was like, what the hell is going on. I was</p> <p>22 startled. Cuffed me behind my back, at which</p> <p>23 time the officer just kept telling me to shut</p> <p>24 the F up, shut the F up, and he grabbed the</p>	<p>1 A. When they put a dent this big in my</p> <p>2 door and knocked it in. Boom, and I woke up,</p> <p>3 and within a second, he was on my bed with his</p> <p>4 feet on my bed.</p> <p>5 Q. And when you say the door, you're</p> <p>6 saying the door to your bedroom?</p> <p>7 A. Yeah.</p> <p>8 Q. Okay. And, again, this is going to</p> <p>9 get a little tedious. I'm sorry, but that's</p> <p>10 just what I need to do.</p> <p>11 A. I understand.</p> <p>12 Q. Okay. First of all, Renae was in</p> <p>13 the bed with you?</p> <p>14 A. She was actually just getting out of</p> <p>15 the shower. She was getting ready for work.</p> <p>16 She came in at the same exact time, like boom.</p> <p>17 Q. So is there a bathroom attached to</p> <p>18 that bedroom?</p> <p>19 A. No. It's right -- you go out the</p> <p>20 hallway and then into another door. It's</p> <p>21 right next to the bedroom.</p> <p>22 Q. So maybe I missed this or maybe I'm</p> <p>23 being thick or something, but when the police</p> <p>24 kicked in the door and you're in the bedroom,</p>

11 (Pages 38 to 41)

Joseph Kluska  
November 6, 2020

Page 42	Page 44
<p>1 was Renae actually in the bedroom?</p> <p>2 A. She walked in, I believe, like right</p> <p>3 at the same time. She heard the bang and came</p> <p>4 in and was like literally doing -- getting</p> <p>5 ready for work, and she came in as I was still</p> <p>6 laying in bed, and then --</p> <p>7 Q. Okay. So was she coming in a</p> <p>8 different doorway?</p> <p>9 A. No; from the bathroom right in.</p> <p>10 Q. There's a bathroom attached to the</p> <p>11 bedroom, right? There's a master bath?</p> <p>12 A. You go out the bedroom door and you</p> <p>13 turn left and in the bathroom door.</p> <p>14 Q. Okay. So I'm just confused about</p> <p>15 where -- so to get in and out of your bedroom,</p> <p>16 there's one door, right?</p> <p>17 A. They came in the outside door.</p> <p>18 Q. Oh, so you're talking about the door</p> <p>19 to the entire house?</p> <p>20 A. Yeah. There's an out -- in my</p> <p>21 bedroom -- I'm sorry about that. In my</p> <p>22 bedroom, there's two doors, one that goes into</p> <p>23 the hallway where the bathroom is and then one</p> <p>24 that goes outside and down the steps. They</p>	<p>1 you saying, or were they saying anything? Did</p> <p>2 they say anything?</p> <p>3 A. They were saying, roll over, roll</p> <p>4 over, roll over, roll over. I rolled over. I</p> <p>5 was like, all right, what is going on? What</p> <p>6 is going on? What the F is going on?</p> <p>7 Put your hands behind your back.</p> <p>8 They didn't explain nothing. They</p> <p>9 didn't do nothing. They put my arms behind my</p> <p>10 back. They cuffed me behind my back.</p> <p>11 Q. Okay.</p> <p>12 A. At which time he ripped me from the</p> <p>13 cuffs and slammed me on the floor, and I'm</p> <p>14 still like, can you tell me what is going on?</p> <p>15 And they were just, shut up, shut up, shut up.</p> <p>16 Q. Okay. So you were laying on your</p> <p>17 back and they told you roll over onto like</p> <p>18 your chest?</p> <p>19 A. Yes, and I did it right away.</p> <p>20 Q. You did it right away, okay.</p> <p>21 And when you did that, had anyone</p> <p>22 actually touched you yet when you rolled over?</p> <p>23 A. He was on my bed with a gun pointed</p> <p>24 at me, and I rolled over on my stomach and at</p>
Page 43	Page 45
<p>1 came in the one that goes outside and down the</p> <p>2 steps. My wife was coming in this door.</p> <p>3 Q. So it's actually the one that goes</p> <p>4 outside down the steps?</p> <p>5 A. Is the one they kicked in.</p> <p>6 Q. And that's a door to the actual</p> <p>7 outside of the house?</p> <p>8 A. Yes.</p> <p>9 Q. Oh, okay.</p> <p>10 A. It's outdoors.</p> <p>11 Q. Okay.</p> <p>12 A. It's like a metal outside door that</p> <p>13 they bashed in.</p> <p>14 Q. Okay. That's where I was confused.</p> <p>15 A. Yeah.</p> <p>16 Q. I've never been to the house, so</p> <p>17 I've had this --</p> <p>18 A. That's fine.</p> <p>19 Q. It sounds kind of like a maze, if</p> <p>20 you ask me.</p> <p>21 A. No. There's an outside door. They</p> <p>22 busted in that door.</p> <p>23 Q. Okay. So you were asleep and then</p> <p>24 that door opens and you're awake. What were</p>	<p>1 which time when I put my hands like this on my</p> <p>2 stomach, they took my hands and put them</p> <p>3 behind my back and zip tied them (indicating).</p> <p>4 Q. So you're indicating that you had</p> <p>5 your hands kind of above your head, although</p> <p>6 you're laying down?</p> <p>7 A. Yeah, yeah, right like this. On my</p> <p>8 stomach with my hands like this. And then</p> <p>9 they cuffed me behind me like this and zip</p> <p>10 tied them (indicating).</p> <p>11 Q. Okay.</p> <p>12 A. They wouldn't even let me get up.</p> <p>13 Q. How many -- I'm going to call them</p> <p>14 troopers because they're troopers. How many</p> <p>15 troopers were there?</p> <p>16 A. In my bedroom -- at my bedroom,</p> <p>17 there was two.</p> <p>18 Q. Two, okay. And could you see their</p> <p>19 faces or were they wearing -- what were they</p> <p>20 wearing?</p> <p>21 A. They were wearing fatigues and</p> <p>22 helmets and everything, but, yeah, I don't --</p> <p>23 I couldn't see their faces at first. Maybe a</p> <p>24 little bit afterwards when things settled down</p>

12 (Pages 42 to 45)

Joseph Kluska  
November 6, 2020

Page 46	Page 48
<p>1 a little bit. 2 Q. Okay. 3 A. But, like I said, they were geared 4 up. And it was 6 o'clock in the morning and 5 it was very hectic, so... 6 Q. And is it fair to say it was dark 7 outside? 8 A. Yeah. It was February. It was -- 9 Q. February at 6:00 a.m., I assume it 10 was? 11 A. Yeah. I was never outside the whole 12 day, so... 13 Q. Was it dark in your bedroom when 14 they came in? Were lights on or anything like 15 that? 16 A. Yeah. There was probably a light 17 on. I was sleeping. 18 Q. Okay. Was there anything 19 distinctive about the two troopers? Was one 20 taller or skinnier, or you can just compare 21 them? 22 A. Yeah, absolutely. One was taller. 23 Q. Okay. They were both white guys? 24 A. Well, the tall one was definitely</p>	<p>1 A. Cuffed me behind my back. 2 Q. And same thing, was that the tall 3 white guy? 4 A. Yes. 5 Q. Okay. And do you know where the 6 other trooper was at that point? 7 A. Standing right next to the bed. 8 Q. And you could see -- I guess you're 9 face down, but you could see because your head 10 is turned? 11 A. Yeah. Well, I was laying on my back 12 when he jumped up on my bed. I was looking at 13 him, and he told me to roll over, and that's 14 when I rolled over. 15 Q. Okay. 16 A. Roll over, put your fucking hands 17 up. 18 I rolled over, put my hands up. So 19 I seen him standing on my bed with his feet. 20 Q. Okay. All right. So you get 21 handcuffed by the tall white guy and then what 22 exactly happens next? 23 A. I just get lifted in the air, and I 24 scream, my fucking shoulders, my shoulders,</p>
Page 47	Page 49
<p>1 white and the other one, the shorter one, I 2 don't know. I don't want to say he wasn't 3 white. Maybe he was just Italian, but he was 4 a little darker skinned. I'm not going to say 5 he was black, but he was -- 6 Q. Right. 7 A. You know what I mean? One was the 8 tall guy. 9 Q. Okay. Well, that's good. I'm 10 asking partially just so I can distinguish 11 between the two. 12 A. Absolutely. Absolutely. 13 Q. So we'll go taller and shorter and 14 one was a little bit more darker skinned? 15 A. Yeah. 16 Q. He wasn't black, but he was just 17 darker than the white guy? 18 A. Absolutely. 19 Q. Okay. Who was yelling at you to 20 roll over? 21 A. The tall white guy. 22 Q. Okay. And you said you had your 23 hands up and then he brought your arms behind 24 your back?</p>	<p>1 and slammed me down on the ground and like I 2 just -- instantly just my shoulders just were 3 in so much pain, and I was asking him to take 4 the cuffs off. He refused to. And I'm like, 5 man, my shoulders, you don't understand, you 6 just ripped my shoulders out, you ripped my 7 shoulders out. 8 Shut up, shut up, shut up. 9 Q. And who was yelling shut up? Were 10 they both yelling or just one of them? 11 A. No. The white guy was. 12 Q. All right. And so which side -- I 13 don't know if this really matters, but which 14 side of the bed -- 15 A. One side is against the wall. 16 There's only one side to come off. The other 17 side is against the wall. 18 Q. Okay. That makes sense. 19 Is there one side on the right side? 20 Where is the wall side? 21 A. When I'm laying on my back in bed, 22 the wall side is to my right, and then the 23 side he threw me is to my left. 24 Q. Okay. So you're face down and he</p>

13 (Pages 46 to 49)



Joseph Kluska  
November 6, 2020

Page 50

1 then takes you pretty much off the bed?  
2 A. So when he's standing on the bed, it  
3 would be to the right.  
4 Q. Okay. Got you.  
5 A. His right.  
6 Q. His right, right. I understand.  
7 A. You know what I mean? I'm laying --  
8 I don't want you to get confused here. I'm  
9 laying on my back, and then I roll over onto  
10 my stomach. So when I'm on my back, the wall  
11 is to my right. The open floor is to my left.  
12 When I roll on my stomach, the wall is to the  
13 left, the open floor is to the right.  
14 Q. I got it. I could visualize it.  
15 A. Okay.  
16 Q. I appreciate that. That is helpful.  
17 And is it the tall white guy that  
18 moved you from the bed to the floor --  
19 A. Yes.  
20 Q. -- or slammed you to the floor?  
21 A. Yes.  
22 Q. And to your knowledge, did the  
23 shorter guy participate in that?  
24 A. He was standing there. I don't

Page 51

1 think he laid a finger on me the whole time.  
2 Q. Okay. Before he moved you from the  
3 bed to the ground, had he asked you to do  
4 anything else?  
5 A. No. It was very quick and very  
6 serious and very crazy happenings.  
7 Q. Okay. And when they moved you, are  
8 you saying he was standing on your bed or he  
9 was standing on the ground and moved you off  
10 the bed?  
11 A. No. He was standing on my bed. He  
12 jumped up on my bed. When he told me to roll  
13 over and put my hands in back, when he said  
14 put your hands, he was standing -- both his  
15 feet were on my bed.  
16 Q. Okay. And I mean --  
17 A. Pointing a gun at me.  
18 Q. I'm just thinking like to handcuff  
19 someone, was he kneeling? I'm just trying to  
20 think --  
21 A. He might have dropped to a knee at  
22 that point on my back. You know what I mean?  
23 And then when I went on the floor, you know  
24 what I mean, like he ripped me up too. It was

Page 52

1 so fast and so quick.  
2 Q. Okay. I understand.  
3 So just where exactly did he grab  
4 you when he moved you from the bed to the  
5 floor?  
6 A. From the zip ties. I would imagine  
7 he just grabbed the zip ties, because both my  
8 arms just ripped right back instantly. I  
9 mean, he didn't like grab this arm and this  
10 arm and pick me up. He grabbed the zip ties  
11 and yanked me up. My arms ripped back  
12 immediately. I felt both of them right away.  
13 Q. Okay. And did you basically slide  
14 off onto the floor and hit the floor or did he  
15 pick you up?  
16 A. No. I was airborne. He picked me  
17 up and slammed me on the floor and then was  
18 like right on me in a second.  
19 Q. Okay. When you say he was right on  
20 you, once you hit the floor?  
21 A. Yeah. And then when he picked me up  
22 off the floor, it was the same thing. He  
23 didn't like help me up. He ripped me up by  
24 the zip ties, like ripped my arms up.

Page 53

1 Q. So then he stands you up and then --  
2 A. Slams me in the chair. There's a  
3 chair right next to a table. There was a  
4 table in my bedroom. And then there I sat  
5 with the cuff behind my back.  
6 Q. Okay. You talked about this a  
7 little bit, but what were you saying at that  
8 point?  
9 A. Can you please tell me what was  
10 going on. What is going on? And they just  
11 wouldn't answer. They just kept saying shut  
12 up. And I kept saying how my shoulders hurt.  
13 You got to take the cuffs off. My shoulders  
14 hurt. You got to take the cuffs off.  
15 And just, shut up, shut up, shut up.  
16 Q. All right. When did you first say  
17 something about your shoulder? I understand I  
18 guess you were saying it when you were in the  
19 chair, but did you say it --  
20 A. Instantly. Instantly. I felt it --  
21 I mean, if you can imagine being ripped up out  
22 of your freaking bed and slammed on the floor.  
23 I'm sorry about my language, but I felt it  
24 instantly and I said it instantly, my

14 (Pages 50 to 53)



Joseph Kluska  
November 6, 2020

Page 54	Page 56
<p>1 shoulders. What the fuck? My shoulders. And</p> <p>2 I was swearing too. What the F. My</p> <p>3 shoulders, my shoulders. You just ripped my</p> <p>4 shoulders out.</p> <p>5 Q. Yeah.</p> <p>6 A. And he kept telling me to shut up,</p> <p>7 just shut up.</p> <p>8 Q. Okay. So you're saying that from</p> <p>9 the moment you basically hit the floor, you</p> <p>10 were complaining about the shoulders?</p> <p>11 A. Absolutely.</p> <p>12 Q. And do you know whether or not they</p> <p>13 got further injured when you were moved from</p> <p>14 the floor to the chair?</p> <p>15 A. Yeah. I would say yeah, because he</p> <p>16 picked me up the same way. I was still cuffed</p> <p>17 behind my back. It wasn't like he helped me</p> <p>18 up. He ripped me up.</p> <p>19 Q. What were you wearing?</p> <p>20 A. I was wearing a pair of blue jeans</p> <p>21 and a T-shirt.</p> <p>22 Q. So then you're in the chair and then</p> <p>23 they take you out of the room at some point?</p> <p>24 A. Well, then -- no. They actually --</p>	<p>1 the bathroom. When they pounced through the</p> <p>2 door, she came running into the bedroom.</p> <p>3 Q. Okay.</p> <p>4 A. She was in the bathroom getting</p> <p>5 ready for work.</p> <p>6 Q. Okay. Were either of the troopers</p> <p>7 interacting with her at that point while they</p> <p>8 were happening to you?</p> <p>9 A. Yes. She came in and was yelling,</p> <p>10 get off him, get off him. What's going on?</p> <p>11 What's going on? And it was -- yeah. And</p> <p>12 then they sat her down too. They made her sit</p> <p>13 down too. I don't think they cuffed her, but</p> <p>14 made her sit down.</p> <p>15 Q. Okay. When you say "made her sit</p> <p>16 down," did anyone make contact with her</p> <p>17 physically, I mean, placed her in a seat or</p> <p>18 you don't remember exactly how that happened?</p> <p>19 A. No. I don't think they were rough</p> <p>20 with her.</p> <p>21 Q. All right.</p> <p>22 A. Hey, is there any way I could use</p> <p>23 the men's room real quick?</p> <p>24 Q. Yes. Absolutely. That's one of the</p>
Page 55	Page 57
<p>1 not right away they don't. They leave and</p> <p>2 another group of guys come in, and then that's</p> <p>3 when they talked to us and bring us</p> <p>4 downstairs.</p> <p>5 Q. Okay.</p> <p>6 A. And then that's when there was</p> <p>7 that -- it went from two guys to...</p> <p>8 Q. Okay. Right. I'm going to get to</p> <p>9 that next. I just want to wrap up with the</p> <p>10 room here.</p> <p>11 A. Okay.</p> <p>12 Q. I guess we still have stuff to talk</p> <p>13 about there.</p> <p>14 So the gun was on the headboard that</p> <p>15 night?</p> <p>16 A. I imagine. I don't know.</p> <p>17 Q. Okay. And --</p> <p>18 A. I really don't remember.</p> <p>19 Q. That's where it would typically be;</p> <p>20 you don't remember it not being there?</p> <p>21 A. No. No.</p> <p>22 Q. Okay. Where was Renae as this was</p> <p>23 happening?</p> <p>24 A. I told you, she was coming out of</p>	<p>1 instructions. That's fine.</p> <p>2 A. It's right here. It will take --</p> <p>3 Q. Take five minutes, because I'm going</p> <p>4 to do the same thing.</p> <p>5 A. All right. Thanks.</p> <p>6 MR. ZEIGER: 11:40?</p> <p>7 MR. BRADFORD: 11:40 is good,</p> <p>8 yes.</p> <p>9 (Short recess.)</p> <p>10 BY MR. BRADFORD:</p> <p>11 Q. How long did you remain in the chair</p> <p>12 in the room before you were taken downstairs,</p> <p>13 approximately?</p> <p>14 A. I don't know. Probably a good 15</p> <p>15 minutes, 10, 15 minutes.</p> <p>16 Q. Okay. And you said at some point</p> <p>17 the two troopers that had been in the room</p> <p>18 with you initially, they left? Left the room,</p> <p>19 I mean.</p> <p>20 A. Yeah. Well, another guy came in.</p> <p>21 Q. So the two troopers that you</p> <p>22 initially had contact with, they were there</p> <p>23 with you and then eventually you and Renae are</p> <p>24 both in a chair in the room, right? Am I</p>

15 (Pages 54 to 57)

Joseph Kluska  
November 6, 2020

Page 58

1 following this right?

2 A. Yeah. We're both in the chair, but  
3 I'm trying to think now. Those two troopers  
4 walked us down to the next room and sat us  
5 down and left, and then that's when the suits  
6 came in.

7 Q. Okay.

8 A. So that's when the suits came in,  
9 the guys that weren't in fatigues.

10 Q. Okay. And those are the --

11 A. The only ones that were in my room  
12 were the ones in the fatigues, at least while  
13 I was in there, and then they went in  
14 obviously afterwards.

15 Q. Okay. So did the two troopers that  
16 you initially had contact with remain with you  
17 from the time you were in that room and then  
18 they took you downstairs?

19 A. Yes.

20 Q. And how long were you in that room  
21 with those two troopers?

22 A. I'm going to say, Kevin, I'm going  
23 to say -- again, it was two and a half years  
24 ago. I'm going to say it was probably 15

Page 59

1 minutes.

2 Q. Okay. Was there any conversation  
3 amongst any of you during those 15 minutes?

4 A. Not conversation-conversation, but I  
5 mean, I tried to get answers out of them, but  
6 they wouldn't give nothing up. You know what  
7 I mean? The tall white guy was -- yeah, not  
8 real, real conversation. They wouldn't let me  
9 smoke a cigarette. I was a nervous wreck.

10 Q. You remained handcuffed behind your  
11 back the entire time?

12 A. The entire time.

13 Q. Okay. What did you try asking them?

14 A. If I could smoke a cigarette.

15 Q. Right. Besides that, did you ask --

16 A. Yeah. I asked them what the hell  
17 was going on right off the bat. I told you  
18 that already. I said that right from the  
19 start, what the F is going on? What's up?  
20 Then when my wife came running in and was like  
21 get off him, she was the same thing, what's  
22 going on? What is this about?

23 They just left us in the dark about  
24 it. We didn't get -- yeah. They left us in

Page 60

1 the dark about it.

2 Q. Did they respond to you at all? Did  
3 they say, don't worry about it or did they  
4 just like ignore you?

5 A. No. They were telling me to shut  
6 the F up. Well, the white guy was. The other  
7 guy was -- it was a good cop/bad cop scenario.

8 Q. So the shorter cop, he didn't tell  
9 you shut the fuck up. Did he give you any  
10 information or did he say anything to you?

11 A. No. He took a cigarette that was  
12 lit and he held it to my mouth, because they  
13 wouldn't take my cuffs off, and let me take a  
14 couple drags. He was all right. He was, you  
15 know...

16 Q. Okay. So then eventually about  
17 approximately 15 minutes later, they bring you  
18 and Renae downstairs?

19 A. Yep. Yes.

20 Q. And what room were you brought into?

21 A. To the living room.

22 Q. Is that the room right behind you  
23 there?

24 A. Yes. Back in there, yeah.

Page 61

1 Q. And who else was in that room?

2 A. At that point, everybody was brought  
3 in. The whole list of names I gave you who  
4 was here was all in that living room.

5 Q. Okay. Was Ada there or had she --  
6 because at some point she left in an  
7 ambulance?

8 A. Yes. That was within the first --  
9 like right away. Like as soon as we came  
10 down, she was in there initially crying and my  
11 teeth, my teeth, my teeth, and then they  
12 allowed her to go right away. The ambulance  
13 was called right away.

14 Q. Okay. So you were in the room with  
15 her briefly at the same time as her?

16 A. Very briefly.

17 Q. Okay. All right. Did they sit you  
18 down? What happens?

19 A. Yeah. They sat us down. And,  
20 again, the whole time I was just saying to  
21 please at least pull my cuffs to the front,  
22 because my shoulders hurt so bad. And we were  
23 just sitting in that room, it seemed like, for  
24 eternity.

16 (Pages 58 to 61)

Joseph Kluska  
November 6, 2020

Page 62

Page 64

1 Q. Okay. So was there any discussion  
2 going on? What was happening in that room  
3 once everybody was in it?

4 A. No. Then as I said, the suits came  
5 in, and they started calling us like one at a  
6 time out to the other room and talking to us,  
7 asking us questions. Other than that, we  
8 pretty much sat in that room for a long time.

9 Q. Okay. How long did you remain in  
10 that room before the troopers left, the guys  
11 in the fatigues, about?

12 A. It wasn't very long. It wasn't very  
13 long. The troopers were -- they busted in,  
14 wrecked the place, and were probably out of  
15 here when all the other guys came in. I want  
16 to say from start to finish, probably not much  
17 more than a half hour. I mean, again, it was  
18 a long time ago, so...

19 Q. No. I know, and just go off your  
20 best memory.

21 A. Yeah. Yeah.

22 Q. Was there any sort of argument  
23 between members of your family and the  
24 troopers while you were in that same room

1 Q. Yes. I'm talking about --

2 A. What happened with everyone else?

3 No.

4 Q. Right. I'm talking about now you're  
5 in the living room with everyone and you said  
6 Jeff was getting loud or -- I don't want to  
7 put words in your mouth, but Jeff was saying  
8 something to the --

9 A. Well, apparently something happened  
10 before I got down here. So I'm just being  
11 honest. Yeah. He looked very -- but, no, I  
12 didn't see nothing, though.

13 Q. And the reason I'm asking this  
14 question is because questioning of the  
15 troopers indicate that there was some sort of  
16 kind of argument.

17 A. Like I said, that must have been  
18 before I came. You know what I mean? Once I  
19 got down here, we were all sitting here just  
20 in confusion. It wasn't -- but, again, I was  
21 in my room for 15, 20 minutes, so...

22 Q. Okay. So you're sitting in the  
23 living room and then the troopers at some  
24 point, they depart and now it's just the suits

Page 63

Page 65

1 together, in the living room on the lower  
2 level?

3 A. I wouldn't say arguing, no. Just  
4 wanting answers, wanting to know what the F  
5 was going on, but, no, I wouldn't say  
6 face-to-face arguing. I mean...

7 Q. Was anyone --

8 A. I wasn't arguing with anybody. I  
9 just wanted my cuffs off.

10 Q. Was anyone yelling at the troopers,  
11 anyone who lived in the house?

12 A. There might have been a little  
13 grappling with words and stuff. I know my  
14 brother-in-law Jeff was really, really upset  
15 and he may have said some things, but I don't  
16 remember word for word or anything like that.

17 Q. Do you remember generally what he  
18 was saying?

19 A. No.

20 Q. Did this interaction ever get  
21 physical?

22 A. Not while I was there, no. I  
23 didn't, no. I told you the interaction -- I  
24 told you the physicality with me.

1 are there?

2 A. Yes. Then it's the suits, yes.

3 Q. Okay. Were they zip tie handcuffs?  
4 What kind of handcuffs were they?

5 A. Zip tie, yes.

6 Q. At some point they were removed,  
7 right?

8 A. No, not until they left.

9 Q. Right. That's what I'm asking.  
10 When were they removed and who removed them?

11 A. Once a local cop -- after I kept  
12 bitching and bitching and bitching, a local  
13 cop put them from my back to my front. He  
14 gave me that much. He put them from my back  
15 to my front, but I was zip tied until they  
16 were done searching the entire property for  
17 probably -- I don't know exactly how long, but  
18 probably six hours. A long, long time. When  
19 I was in that living room the whole entire  
20 morning, the whole entire time that they were  
21 searching the property, I was not free-handed  
22 one time until they left. They cut my zip  
23 ties off when they left.

24 Q. Okay. But --

17 (Pages 62 to 65)

Joseph Kluska  
November 6, 2020

Page 66

1 A. But they did move them from the back  
2 to the front.

3 Q. And that was, would you say, shortly  
4 after you got to the living room initially?

5 A. No. No. Because the whole time I  
6 was in the living room I was still just  
7 bitching, my shoulders, my shoulders, you guys  
8 ain't listening to me, I'm telling you my  
9 shoulders are killing me, and they're like,  
10 just hold on, hold on, hold on, and then  
11 finally one of them -- I don't know which one,  
12 but was like, all right, I'll just move them  
13 to the front, and he moved them to the front.

14 Q. And that was a guy in the suit or  
15 was he in fatigues?

16 A. No, no, not fatigues. I don't think  
17 he was like a suit and tie suit. A police  
18 officer.

19 Q. Right. I'm sorry.

20 And I'm sorry if I asked this, but I  
21 just don't think I have a clear answer on this  
22 yet. You're brought down to the living room?

23 A. Yep.

24 Q. Eventually you see that the troopers

Page 67

1 in the fatigues, they leave, right?

2 A. Yes.

3 Q. How much time passed just in that  
4 timeframe, from when you get down to the  
5 living room to when they --

6 A. Again, I said I don't think that  
7 long. I don't know exactly. I'm not going to  
8 put an exact minute on it, but not that long.  
9 They switched from fatigues to police officers  
10 rather swiftly.

11 Q. Okay. Did you eventually learn why  
12 they were there?

13 A. Yeah.

14 Q. How did you find out?

15 A. They had said that -- the one  
16 officer had said what was going on. They had  
17 reason to believe there was drugs here and  
18 this, that, and the other thing, and that's  
19 what they were searching for.

20 Q. When you say one of the officers,  
21 was it one of the troopers in fatigues or one  
22 of the other people that showed up later?

23 A. Police officer.

24 Q. Police officer, okay.

Page 68

1 Did you request medical attention at  
2 that time? I know you said you were in pain.

3 A. No. I didn't ask to go to the  
4 hospital or nothing like that, no.

5 Q. Okay.

6 A. I just wanted the cuffs released. I  
7 was in a lot of pain.

8 Q. And we already talked about how you  
9 were charged with possession of marijuana?

10 A. Yes, you did.

11 Q. We talked about that earlier. Okay.

12 Were you detained at all? Did you  
13 have to go to the police station, or how did  
14 that process go?

15 A. I got charges in the mail.

16 Q. Okay. So at some point did you seek  
17 medical care for your shoulders?

18 A. Oh, absolutely, yes.

19 Q. I'm going to move onto that.

20 Do you remember what the first thing  
21 you did to address your shoulders?

22 A. Yeah. The first thing I did was try  
23 and just get by it, and then just couldn't and  
24 then the first thing I did was, I went to the

Page 69

1 doctor.

2 Q. You were working at Comunale  
3 Construction at that time?

4 A. Yes.

5 Q. Did you go to work like the next day  
6 you were due to work after February 23rd,  
7 2018?

8 A. No.

9 Q. And why not?

10 A. I was actually laid off at that  
11 time.

12 Q. Okay.

13 A. Yep.

14 Q. How long had you been laid off for?

15 A. I don't remember. Probably at that  
16 time, maybe -- a lot of times when it gets  
17 real nasty in like January, mid January.  
18 Never before that. So maybe a month.

19 Q. When you say "laid off," that means  
20 because just not enough work to do or was it  
21 something different?

22 A. Yeah, in the wintertime. Yeah,  
23 wintertime it slows down. I do roofing  
24 outside. Wintertime it slows down.

18 (Pages 66 to 69)

Joseph Kluska  
November 6, 2020

Page 70

1 Q. So it's just due to lack of work,  
2 not because of some incident or anything that  
3 happened at work?

4 A. Excuse me one minute, Kevin. I got  
5 to hit the screen. It's blocking you.

6 Why is that not doing it? If I hit  
7 okay -- I can't see your face. I can see your  
8 neck down. I can't see your face. It says  
9 wait an hour. Okay. Restart now. I'm trying  
10 to do this.

11 MR. ZEIGER: Click that wait an  
12 hour again.

13 THE WITNESS: I am hitting it.

14 MR. ZEIGER: It just takes a  
15 minute until the computer acknowledges  
16 that you want to wait an hour. It's no  
17 big deal.

18 THE WITNESS: Same thing, now I  
19 see your face, but only like nose down.

20 (Discussion held off the  
21 record.)

22 BY MR. BRADFORD:

23 Q. I was just starting to ask you about  
24 your -- you were talking about you were laid

Page 72

1 A. Yes. My wife has a lot of --  
2 whatever. I don't know.

3 Q. Is that your money or is that your  
4 wife's money?

5 A. My wife's money.

6 Q. Did you know that was there?

7 A. No.

8 Q. And you found out after this  
9 incident that there was \$15,000 in the  
10 floorboard --

11 A. Yep.

12 Q. -- and underneath the floor of your  
13 room essentially?

14 A. Mm-hmm.

15 Q. Did you know there was a compartment  
16 there in the floor?

17 A. It wasn't in the floorboard.

18 Q. Where was it?

19 A. There was no floorboard in my room.  
20 Underneath my bed. As far as I knew, it was  
21 underneath the bed. I knew she had money. I  
22 didn't know no amount, so...

23 Q. Okay.

24 A. But there's no floorboard.

Page 71

1 off, and that was due to lack of work. It  
2 wasn't because of some --

3 A. The weather. The weather. I'm  
4 usually only laid off a couple weeks in the  
5 winter. That's it.

6 Q. So it was during that time.

7 Just while we're on the subject,  
8 when was the next time you went to work?

9 A. I went back to work, I believe, I'm  
10 going to say usually -- and, again, I don't  
11 remember exact dates, but I'm going to say it  
12 was the end of March.

13 Q. Okay.

14 A. Or middle of March. Like sometime  
15 in March. Usually January and February are  
16 two really rough months.

17 Q. There's one thing I did want to ask  
18 you about. In your room, did you have a large  
19 amount of cash?

20 A. I did not, no.

21 Q. Okay. So you understand that there  
22 was \$15,000 recovered from --

23 A. Yes.

24 Q. -- a compartment in the floor?

Page 73

1 Q. So at some point you sought medical  
2 care for your shoulders?

3 A. Yeah.

4 Q. And I have you getting an MRI on  
5 March 22nd, 2018, just to give you kind of  
6 a --

7 A. That makes sense, because when I  
8 finally went back to work is when I only  
9 worked a couple days and I was like I can't do  
10 this. And then that's when I was like I  
11 couldn't -- I tried to do it and couldn't do  
12 it.

13 Q. Okay.

14 A. It was different from the time that  
15 it happened when I wasn't working to the time  
16 I tried to go back to work, and I just  
17 couldn't pull it off.

18 Q. Okay.

19 A. So that makes sense with the March  
20 22nd.

21 Q. Okay. So you weren't working due to  
22 lack of work initially and then you came back  
23 to work because business picked up and then  
24 you realized once you actually started working

19 (Pages 70 to 73)



Joseph Kluska  
November 6, 2020

Page 74

1 that the shoulders were affecting your ability  
2 to actually do the job?

3 A. Real bad, yeah.

4 Q. Okay. I'm going to share a screen  
5 here just so as I walk you through kind of the  
6 sequence of events. I'm going to show you  
7 some medical records I selected. I have a  
8 bunch of medical records, not all of them.

9 Just for the record, I have this  
10 marked as -- we'll have this marked as D-11,  
11 and these are just selected medical records  
12 relating to Joseph Kluska.

13 And the first page I'm showing you,  
14 Mr. Kluska -- and I'm going to be saying  
15 things just for the record here -- it's Bates  
16 stamped Anglemeyer-925 at the bottom. This is  
17 a document requesting an MRI that was done of  
18 your right shoulder on March 22nd, 2018. Do  
19 you see that?

20 A. I see it.

21 Q. Okay. And then it looks like you  
22 got a -- three pages ahead to -- wait. The  
23 Bates stamp is upside down on this one,  
24 Anglemeyer-927, which shows you had an MRI of

Page 76

1 Q. Okay. And it looks like -- I'm  
2 going to scroll ahead here and show you  
3 documents before I ask you questions or maybe  
4 I'll show you documents as I ask you  
5 questions. I'm going to go to Anglemeyer-835.  
6 This is a document from The Surgical Specialty  
7 Center at Coordinated Health, Bethlehem  
8 Campus. It seems to indicate you had surgery  
9 on May 2nd, 2018?

10 A. Yep. Yep.

11 Q. And I'm just going to read in the  
12 highlighted parts here. "Procedure performed:  
13 Open repair of completely avulsed full  
14 thickness tear, upper border right  
15 subscapularis tendon." And then No. 2,  
16 "excision and removal of small cyst superior  
17 aspect right shoulder."

18 Is that your understanding of the --  
19 is that the technical description of what --

20 A. That's what it says.

21 Q. You had surgery on your right  
22 shoulder?

23 A. Yeah.

24 Q. To repair a torn tendon?

Page 75

1 your left shoulder on 3/29/18?

2 A. Sounds right.

3 Q. Okay. So I'm assuming you went to  
4 the doctor and the doctor said we should get  
5 some MRIs done of your shoulder?

6 A. Yeah. I couldn't perform my job.

7 Q. Okay. From the time of the  
8 incident, February 23rd, 2018, to the time you  
9 started back to work, how were your shoulders  
10 feeling?

11 A. Horrible.

12 Q. Did it get worse, feel the same?

13 A. No. It was just -- it was real bad.  
14 I couldn't do my job. I couldn't lift my  
15 arms. I couldn't move them right. I  
16 couldn't -- I still can't.

17 Q. Okay. Before February 23rd, 2018,  
18 had you had any issues with your upper body,  
19 your shoulders or your back or anything like  
20 that?

21 A. No. I mean, I've had back problems  
22 in the past. I'm not -- I've had back  
23 problems in the past, but never nothing with  
24 my shoulders.

Page 77

1 A. Yes.

2 Q. And what happened after surgery?  
3 First of all, did they give you a sling or  
4 anything like that? Did you have to have  
5 any --

6 A. Yeah. I was wrapped up for quite a  
7 little while, yeah.

8 Q. Okay. Were you wearing a sling  
9 before that?

10 A. No. No. I was just not doing  
11 nothing.

12 Q. Okay. In between the MRI and the  
13 surgery, you remained out of work?

14 A. Yes.

15 Q. Were you collecting unemployment or  
16 anything like that?

17 A. No.

18 Q. When you're typically laid off for  
19 the seasonal thing, would you collect  
20 unemployment or was there any source of income  
21 during those times?

22 A. No. If I was laid off, I was  
23 collecting unemployment.

24 Q. All right. Was there any physical

20 (Pages 74 to 77)



Joseph Kluska  
November 6, 2020

Page 78	Page 80
<p>1 therapy? Or what did the recovery from this 2 procedure involve? 3 A. Yeah, physical therapy. 4 Q. And how often would you have to do 5 physical therapy? 6 A. Several times a week. I don't know 7 exactly how many, but... 8 Q. Would that be at the physical 9 therapist or was that on your own as well? 10 A. No. I went to Coordinated Health. 11 Q. Coordinated Health, okay. I don't 12 think I have those. I have some of those 13 records, I think through your attorney. 14 I'm going to scroll ahead here. 15 Here's one. So now I'm still on D-11. I'm at 16 Anglemeyer-813. At some point the therapy 17 ended? 18 A. Yes. 19 Q. And was the therapy to address the 20 recovery from the right shoulder surgery? 21 A. It was both. It was recovery from 22 the shoulder surgery and -- like I said, when 23 it ripped, the right one ripped totally. The 24 left one was only partially tore. So the</p>	<p>1 right shoulder four months S/P open 2 subscapularis repair with removal of cyst. 3 Date of surgery 5/2/18. He states the 4 shoulder is doing okay. He has not been in 5 therapy since late July due to hospitalization 6 for diverticulitis and then financial issues. 7 He has returned to work. He notes some 8 discomfort in the morning if he sleeps on the 9 shoulder at night." 10 And then I'm just going to scroll 11 ahead to the final page. It says 12 Discussion/Summary. "Doing well four months 13 post-op. Follow up as needed." 14 First of all, do you recall if this 15 was the last time you went to therapy? 16 A. No. I don't recall dates. 17 Q. Okay. Do you remember -- 18 A. I know I was broke. 19 Q. Do you remember it being around 20 September? 21 A. It could have been. Again, that was 22 a long time ago. If that's what it says, then 23 that's what it was. 24 Q. I don't have any records beyond</p>
Page 79	Page 81
<p>1 therapy was -- they did therapy on both of 2 them. This was recovery; this was to try and 3 prevent having surgery (indicating). 4 Q. Okay. So right was recovery; left 5 was to prevent having surgery? 6 A. Prevention, yes. 7 Q. Understood. 8 And I'm showing you records from a 9 visit at Coordinated Health, the therapist, 10 from September 14th, 2018. The provider is 11 Dr. Luchetti. 12 A. Luchetti, yes. 13 Q. Luchetti. Sorry. If there's a 14 wrong way to say something, I will say it that 15 way. 16 A. I don't even know how to turn a 17 computer on. 18 Q. I have issues too. 19 All right. And I'm just showing you 20 this because it seems to me that this is the 21 end of your therapy. So that's why I'm 22 presenting this to you. I'll read this 23 section on Page 814, Anglemeyer-814. 24 "44-year-old male presents for re-check of</p>	<p>1 this, so that's why I'm asking you. 2 A. Yeah. 3 Q. I mean, it doesn't say, okay, you're 4 definitely cut loose or something. It says 5 follow up as needed. 6 A. If it says my last thing was 7 September, then it probably was. 8 Q. All right. We'll see if there's any 9 other records that help. 10 I do want to ask you, so you were 11 hospitalized at some point in July? 12 A. Mm-hmm. 13 Q. You have to say yes. 14 A. Oh, yes. Sorry about that. 15 Q. Can you just generally describe what 16 that was about and how long you were 17 hospitalized? 18 A. I had diverticulitis. It's an 19 infection in my stomach. And I was there, I 20 think, like eight days. 21 Q. Okay. And just to be clear, did 22 that have anything to do with your shoulders? 23 A. No. 24 Q. Okay. I just have to ask that</p>

21 (Pages 78 to 81)

Joseph Kluska  
November 6, 2020

Page 82

1 question.

2 A. No. That's fine. It's an infection  
3 in the stomach.

4 Q. Okay. After you ended physical  
5 therapy, was there anything else you were  
6 doing for your shoulders? Were you doing  
7 exercises at home or did you go back to  
8 physical therapy?

9 A. No. I had to try and work, and it's  
10 kind of just been dealing with it ever since.  
11 It's not easy.

12 Q. Okay. And you did, according to  
13 this note here, at least as of September 14th,  
14 2018, assuming they wrote down what you said  
15 correctly, you had returned to work?

16 A. Yeah. I did return to work.

17 Q. At least as of September 14th, 2018  
18 you had returned to work. Do you remember how  
19 far in advance -- do you remember when you did  
20 return to work?

21 A. No. I don't remember exact date,  
22 no.

23 Q. When you were hospitalized, were you  
24 working at that time?

Page 84

1 I just -- I deal with it. I mean, I'm limited  
2 now. You know what I mean? I can't carry  
3 bundles or stuff like that anymore. I just --  
4 I can't do it. I just do what I can to get  
5 by.

6 Q. Okay. Since we'll say September  
7 2018, has it slowly improved or has it stopped  
8 improving?

9 A. It's obviously not as bad as it was  
10 then, but it's not improving. It's been two  
11 years, and like I said, it takes me probably a  
12 good 20 minutes every single morning of my  
13 life to where I get up and I'm -- it takes me  
14 a long time to get moving and getting -- it  
15 hurts. Every day it bothers me, every single  
16 day, Kevin. Every day.

17 Q. Okay. We talked about you returning  
18 to work in 2018 at some point.

19 A. Yep. Yes.

20 Q. And you were still at Comunale  
21 Construction then?

22 A. Yes.

23 Q. And did you return at the same work  
24 level at that point?

Page 83

1 A. No. I don't recall. July? No.  
2 No, I was not working. No. When I was --  
3 when I had my stomach issue, I was not  
4 working. I was still off work.

5 Q. Okay. Did your stomach issue --  
6 obviously when you were in the hospital, that  
7 was part of the reason you couldn't work?

8 A. No. I was out because of my  
9 shoulder, and I had the stomach issue while I  
10 was out because of my shoulder. It just  
11 happened to be when it happened. I don't  
12 know.

13 Q. Okay. How are your shoulders today?

14 A. Like I said, it's every day. I  
15 mean, I just deal with it. I don't know if  
16 you ever had a serious injury, but I just deal  
17 with it. I mean, I'm cut open, man. It gets  
18 me -- I just deal with it. It bothers me.  
19 There's not a day that goes by that it does  
20 not bother me, not one day. I just deal with  
21 it.

22 Q. Okay.

23 A. Obviously it's not as bad as it was  
24 when it happened. You know what I mean? But

Page 85

1 A. In job description, same crew, but  
2 like I said, it was just -- I was limited  
3 after that.

4 Q. Okay. Was your hourly rate the  
5 same?

6 A. Yes.

7 Q. When did you stop working at  
8 Comunale Construction? I'm sorry if I covered  
9 this. I'm just trying to do it in sequence  
10 here.

11 A. I think the last time I worked for  
12 them was, I'm going to say, right before the  
13 pandemic. Whatever exact date, I don't know  
14 the exact date. February, maybe March.

15 Q. Right.

16 A. I worked with them until then, yeah,  
17 of this year.

18 Q. Have you remained in contact with  
19 them to -- my understanding is that the  
20 pandemic hit and that shut basically all kinds  
21 of construction down?

22 A. Yes.

23 Q. And so you were probably one of  
24 several people who were laid off at that time;

22 (Pages 82 to 85)

Joseph Kluska  
November 6, 2020

Page 86

1 is that your understanding?

2 A. The whole state shut down. Don't  
3 you remember?

4 Q. Right. So have you maintained  
5 contact with them to return to work as we  
6 somehow ever emerge from the Coronavirus?

7 A. No. There was just personal issues  
8 throughout the whole pandemic and then I  
9 just -- I haven't gone back to work with them  
10 since this ended.

11 Q. So you have no plans to go back to  
12 work with them?

13 A. No.

14 Q. Okay. You said personal issues. Is  
15 that some issues you had --

16 A. There was just things through the  
17 pandemic. It's just -- it has nothing really  
18 to do with this. It's just personal issues  
19 through the pandemic where things came to a  
20 head and I'm not going back to work for them.

21 Q. Okay. But you would still be  
22 physically able to -- I mean, I know you can't  
23 work to the same level that you did before  
24 this whole incident, but you could still

Page 87

1 technically be able to do the job?

2 A. If I had to. Maybe just not -- I  
3 can't do it every day. It's why, like I said,  
4 I've been doing my own thing, because I  
5 don't -- I can't do it every day no more. I  
6 just can't. Too much.

7 Q. Okay.

8 MR. BRADFORD: Brian, do we  
9 have for Joe, do we have emotional on  
10 this? Because it's going to affect it if  
11 I get into something else.

12 MR. ZEIGER: Well, my view  
13 is -- can we go off the record.

14 MR. BRADFORD: Yes.

15 (Discussion held off the  
16 record.)

17 BY MR. BRADFORD:

18 Q. Mr. Kluska, due to this incident,  
19 did you seek any professional mental health  
20 care, like with a counselor or psychologist or  
21 psychiatrist?

22 A. No.

23 Q. Okay. And it's my understanding  
24 that based on a conversation off the record,

Page 88

1 that your attorney will not be pursuing  
2 damages for emotional distress and so,  
3 therefore, I'm not going to ask you questions  
4 that could relate to your mental health status  
5 and other issues happening in your life.

6 A. I don't understand what you're  
7 saying.

8 MR. BRADFORD: Well, Brian, can  
9 you just acknowledge that?

10 MR. ZEIGER: Let's go off the  
11 record here again.

12 (Discussion held off the  
13 record.)

14 BY MR. BRADFORD:

15 Q. So, Mr. Kluska, you spoke with your  
16 attorney, and I think we confirmed that you're  
17 not proceeding with emotional distress damages  
18 in this case, at least with respect to your  
19 claims?

20 A. No, I'm not.

21 Q. Okay. Sir, give me one second. I  
22 think I'm done.

23 I do want to ask you about -- you  
24 went to the emergency department in November

Page 89

1 of 2018 for a -- you had a fall and you had a  
2 broken rib. Do you remember that?

3 I'm going to show that to you. I'll  
4 show you a document just to refresh your  
5 recollection. I'm still in D-11,  
6 Anglemeyer-1240. It indicates at the top  
7 there in highlight that you were admitted to  
8 Saint Luke's Anderson Campus on November 18th,  
9 2018, and it says "Chief Complaint: Fall.  
10 Patient fell last night on step."

11 Do you recall that?

12 A. Yeah, vaguely. Yeah.

13 Q. Do you have any pain from that  
14 incident?

15 A. I can't read this right again now.  
16 What did I hit?

17 Q. I'll read it to you. "Slipped on  
18 icy step yesterday a.m. and fell backward.  
19 Landed on right posterior rib on concrete  
20 steps. Didn't hit head. Denies neck or back  
21 pain. Complains of eight out of ten pain in  
22 the right posterior ribs with radiation around  
23 toward the front. Worse with movement or deep  
24 inspiration."

23 (Pages 86 to 89)

Joseph Kluska  
November 6, 2020

Page 90	Page 92
<p>1 A. And when was this happening?</p> <p>2 Q. This says November 18th, 2018.</p> <p>3 That's your name there at the top?</p> <p>4 A. Yeah.</p> <p>5 Q. Any recollection of this?</p> <p>6 A. Yeah. Yeah. That was a non-issue.</p> <p>7 It was my rib. I thought I broke it and I</p> <p>8 didn't.</p> <p>9 Q. Okay. Well, it then says -- I moved</p> <p>10 on to another page. It's Anglemeyer-1246, and</p> <p>11 I'm going to read from the highlighted part.</p> <p>12 It's progress notes by a PA on November 18th.</p> <p>13 It says, "Patient was called and notified of</p> <p>14 his fracture of the right ninth rib."</p> <p>15 A. Yeah. I think it was -- I guess</p> <p>16 fractured would be the right word, yeah.</p> <p>17 Yeah.</p> <p>18 Q. Did this incident cause any -- I</p> <p>19 don't see it anywhere. Did that cause any</p> <p>20 damage to your shoulders?</p> <p>21 A. No.</p> <p>22 Q. And you mentioned earlier you had</p> <p>23 back -- can you just generally tell me what</p> <p>24 your back issues were before February 2018?</p>	<p>1 THE WITNESS: All right.</p> <p>2 MR. ZEIGER: Wait a second.</p> <p>3 I'm sorry. I know I said I don't ask</p> <p>4 questions to my witnesses, but I do have</p> <p>5 a question for him. I'm sorry.</p> <p>6 Can you unshare?</p> <p>7 MR. BRADFORD: I'm trying to do</p> <p>8 that right now.</p> <p>9 BY MR. ZEIGER:</p> <p>10 Q. Mr. Kluska, good afternoon. It's</p> <p>11 Brian, your attorney. How are you today?</p> <p>12 A. Okay.</p> <p>13 Q. Mr. Kluska, do you recall when the</p> <p>14 troopers left and the locals were there?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Can you please tell us about</p> <p>17 how long it was that you were like maintained</p> <p>18 in custody of the locals after the incident?</p> <p>19 A. I'm going, like I said --</p> <p>20 MR. BRADFORD: Objection to the</p> <p>21 form.</p> <p>22 You can answer.</p> <p>23 THE WITNESS: I'm going to say</p> <p>24 it happened at 6:00 in the morning and</p>
Page 91	Page 93
<p>1 A. I have a bad back. I've been</p> <p>2 roofing for 30 years almost. I have a bad</p> <p>3 back.</p> <p>4 Q. Okay.</p> <p>5 A. Sore back, bad back.</p> <p>6 Q. Okay. Does that cause you any pain</p> <p>7 or discomfort?</p> <p>8 A. My back?</p> <p>9 Q. Yes.</p> <p>10 A. Yes.</p> <p>11 Q. When you got surgery and the rehab,</p> <p>12 did you have health insurance at that point?</p> <p>13 A. Through my wife's work.</p> <p>14 Q. Okay.</p> <p>15 MR. BRADFORD: I think I'm</p> <p>16 done, Mr. Kluska. Thank you for your</p> <p>17 time. I know this isn't fun, but it's</p> <p>18 part of the procedure.</p> <p>19 THE WITNESS: I totally</p> <p>20 understand it.</p> <p>21 MR. BRADFORD: Nothing</p> <p>22 personal.</p> <p>23 MR. ZEIGER: Joe, thank you</p> <p>24 very much.</p>	<p>1 I'm going to probably say it was 2:00 or</p> <p>2 3:00 in the afternoon. So probably a</p> <p>3 good seven, eight hours.</p> <p>4 BY MR. ZEIGER:</p> <p>5 Q. And you had your hands zip tied</p> <p>6 behind your back during that entire period of</p> <p>7 time?</p> <p>8 A. I told you, after a while they let</p> <p>9 me put them in the front, but they were still</p> <p>10 zip tied.</p> <p>11 Q. How long of a time passed from when</p> <p>12 you were sat in the chair and then they</p> <p>13 released your hands to the front and then</p> <p>14 recuffed you or zip tied you?</p> <p>15 A. Brian, I begged those guys for</p> <p>16 probably halfway. Three, four -- probably</p> <p>17 three, four hours I sat there with them behind</p> <p>18 my back. It was a while.</p> <p>19 Q. I understand that your mother-in-law</p> <p>20 Ada was removed from the property by an</p> <p>21 ambulance, correct?</p> <p>22 A. Yes.</p> <p>23 Q. Other than your mother-in-law, the</p> <p>24 rest of the people that were present there, to</p>

24 (Pages 90 to 93)

Joseph Kluska  
November 6, 2020

<p style="text-align: right;">Page 94</p> <p>1 your knowledge, were they all kept on the same 2 timeline as you or were any of them released 3 earlier? 4 A. No. We weren't allowed to leave the 5 room. Just to go to the bathroom. That was 6 it. And there's a bathroom right in the 7 living room. So, no, we couldn't go nowhere. 8 Q. So as far as you know, the entire 9 group of people was held by law enforcement 10 for somewhere between six and seven hours? 11 A. Mark, I believe, was taken away. 12 Q. So Mark was arrested. Ada was taken 13 to the hospital by ambulance? 14 A. Yeah. 15 Q. Everyone else that was involved in 16 the case was kept in the house restrained for 17 somewhere between six and seven hours, except 18 to go to the bathroom? 19 MR. BRADFORD: Objection to the 20 form. 21 THE WITNESS: Yes, absolutely. 22 MR. ZEIGER: Thank you. I have 23 nothing further. 24 BY MR. BRADFORD:</p>	<p style="text-align: right;">Page 96</p> <p>1 remember. 2 Q. Had you ever seen a marijuana grow 3 operation or Molotov cocktails or ingredients 4 for Molotov cocktails in his room? 5 A. No. 6 Q. Was this a concern for you? Did you 7 ever talk to him about this? 8 A. No, I haven't really. 9 Q. You know he pled guilty to at least 10 one charge? 11 A. Whatever he did when he went to 12 court. I don't know what he did. 13 Q. You didn't really talk to -- 14 A. He's my stepson. I don't talk to 15 him all the time, no. I don't recall what 16 exactly details of what happened with him, no. 17 Q. Okay. Okay. 18 A. Okay? 19 MR. BRADFORD: I'm good. 20 (Exhibit D-11 marked for 21 identification.) 22 (Witness excused.) 23 (Deposition concluded at 12:27 24 p.m.)</p>
<p style="text-align: right;">Page 95</p> <p>1 Q. I do have a follow-up question. 2 Did I ask you if Tyeler Trinkley was 3 charged with anything on that day? 4 A. I'm not real certain. 5 Q. Are you aware that they discovered 6 what was believed to be a marijuana grow 7 operation in his closet? 8 A. No. 9 MR. ZEIGER: I'll object. It's 10 outside the scope of the questions that I 11 asked, but I'll allow -- 12 MR. BRADFORD: You asked about 13 people being restrained when it happened. 14 MR. ZEIGER: I understand that. 15 I said I'll instruct you to answer, if 16 you know. 17 MR. BRADFORD: Okay. 18 THE WITNESS: I don't recall 19 those charges or nothing, no. 20 BY MR. BRADFORD: 21 Q. And do you recall the police finding 22 at least the materials to make Molotov 23 cocktails in his room? 24 A. If that's what they said, I don't</p>	<p style="text-align: right;">Page 97</p> <p>1 CERTIFICATE 2 I HEREBY CERTIFY that the 3 proceedings, evidence and objections are 4 contained fully and accurately in the 5 stenographic notes taken by me upon the 6 foregoing matter, and that this is a true and 7 correct transcript of same. 8 9 10 11 12 ----- 13 MICHELE L. MURPHY 14 RPR-Notary Public 15 16 17 18 19 (The foregoing certification of this 20 transcript does not apply to any reproduction 21 of the same by any means, unless under the 22 direct control and/or supervision of the 23 certifying reporter.) 24</p>

25 (Pages 94 to 97)



Joseph Kluska  
November 6, 2020

Page 1

<b>A</b>	<b>air</b> 40:2 48:23	<b>apparently</b> 64:9	39:5	54:9 85:20	<b>bird</b> 24:21	63:14	53:2,3,19
<b>a.m</b> 1:18 46:9	<b>airborne</b> 52:16	<b>apply</b> 97:20	<b>avulsed</b> 76:13	<b>bat</b> 59:17	<b>birthday</b> 25:24	<b>brother-in-...</b> 18:15	54:14,22
89:18	<b>al</b> 1:5,8	<b>appreciate</b> 50:16	<b>awake</b> 43:24	<b>Bates</b> 74:15	<b>bit</b> 40:20	<b>brought</b> 40:10 47:23	57:11,24
<b>ability</b> 74:1	<b>allegation</b> 28:12 29:19	<b>approxima...</b> 1:17 10:11	<b>aware</b> 28:5	74:23	45:24 46:1	60:20 61:2	58:2 93:12
<b>able</b> 86:22	<b>allegations</b> 29:8	57:13 60:17	28:11 29:7	<b>bath</b> 42:11	47:14 53:7	66:22	<b>chairs</b> 40:5
87:1	<b>allege</b> 28:9	<b>Arch</b> 2:9	29:11 38:2	<b>bathroom</b> 41:17 42:9	<b>bitching</b> 65:12,12,12	<b>bucks</b> 13:1,3	<b>charge</b> 96:10
<b>absolutely</b> 6:5 7:8	<b>alleged</b> 6:3	<b>area</b> 23:23	95:5	42:10,13,23	66:7	<b>bud</b> 32:1	<b>charged</b> 13:9
10:2 18:9	<b>Allentown</b> 9:18,20,21	26:17	<b>B</b>	56:1,4 94:5	<b>black</b> 47:5,16	<b>bunch</b> 74:8	13:19 14:2
19:23 26:14	10:1,12	<b>arguing</b> 63:3	<b>B 3:8</b>	94:6,18	<b>blocking</b> 70:5	<b>bundles</b> 84:3	14:3 68:9
46:22 47:12	11:3 14:17	63:6,8	<b>back</b> 7:9 9:4	<b>bed</b> 29:11	<b>blue</b> 54:20	<b>business</b> 73:23	95:3
47:12,18	24:5	<b>argument</b> 62:22 64:16	9:15 10:16	35:23 38:16	<b>Blvd</b> 2:4	<b>busted</b> 29:10	<b>charges</b> 13:16,23
54:11 56:24	<b>allow</b> 95:11	<b>arm</b> 52:9,10	11:16,17	39:17 41:3	<b>body</b> 75:18	39:14 43:22	14:7 68:15
68:18 94:21	<b>allowed</b> 61:12 94:4	<b>arms</b> 44:9	15:14 21:9	41:4,13	<b>boom</b> 41:2,16	62:13	95:19
<b>accurately</b> 97:4	<b>ambulance</b> 61:7,12	47:23 52:8	22:9 35:6	42:6 44:23	<b>border</b> 76:14		<b>check</b> 23:12
<b>acknowledge</b> 88:9	93:21 94:13	52:11,24	39:20,22	48:7,12,19	<b>born</b> 6:23	<b>C</b>	<b>chest</b> 44:18
<b>acknowled...</b> 70:15	<b>amount</b> 71:19 72:22	75:15	40:1 44:7	49:14,21	<b>bother</b> 83:20	<b>C 2:1</b>	<b>Chief</b> 89:9
<b>ACTION</b> 1:5	<b>and/or</b> 97:22	<b>arrested</b> 13:6	44:10,10,17	50:1,2,18	<b>bothers</b> 83:18	<b>C-O-M-U-...</b> 11:24	<b>child</b> 24:20
<b>actual</b> 43:6	<b>Anderson</b> 89:8	13:19 94:12	45:3 47:24	51:3,8,10	84:15	<b>cabinet</b> 38:3	<b>children</b> 7:21
<b>Ada</b> 1:5 2:12	<b>Anglemeyer</b> 1:5 2:12	19:20	48:1,11	51:11,12,15	<b>bottom</b> 74:16	<b>call</b> 45:13	8:16 23:10
6:14 17:8	<b>Angleme...</b> 89:6	<b>arrests</b> 19:13	49:21 50:9	52:4 53:22	<b>bought</b> 9:11	<b>called</b> 37:5	<b>China</b> 38:3
61:5 93:20	<b>Anglemeyer...</b> 90:10	19:20	50:10 51:13	72:20,21	9:12 28:7	40:13 61:13	<b>cigarette</b> 59:9
94:12	<b>Anglemeyer...</b> 78:16	51:22 52:8	51:22 52:8	<b>bedroom</b> 14:18 15:16	<b>box</b> 30:20	90:13	59:14 60:11
<b>additional</b> 25:8	<b>Anglemeye...</b> 76:5	52:11 53:5	54:17 59:11	15:19,19	<b>boyfriend</b> 25:10	<b>circumstan...</b> 14:14	<b>circle</b> 26:11
<b>address</b> 9:2	<b>Anglemeye...</b> 74:16	60:24 65:13	60:24 65:13	18:12 23:11	<b>Bradford</b> 2:8	<b>calling</b> 62:5	26:15
10:1 68:21	<b>Anglemeye...</b> 74:24	65:14 66:1	71:9 73:8	39:15 40:6	3:3 5:12,14	<b>Campus</b> 76:8	<b>CIVIL</b> 1:5
78:19	<b>Anglemeye...</b> 92:10 93:2	73:16,22	75:9,19,21	41:6,18,21	21:22,24	89:8	<b>claims</b> 6:2
<b>administeri...</b> 4:10	<b>Anglemeye...</b> 92:10 93:2	75:22 82:7	75:22 82:7	41:24 42:1	28:23 29:2	<b>care</b> 68:17	88:19
<b>admitted</b> 89:7	<b>Anglemeye...</b> 92:10 93:2	86:9,11,20	86:9,11,20	42:11,12,15	29:6 33:7	73:2 87:20	<b>cleaner</b> 28:20
<b>advance</b> 82:19	<b>Anglemeye...</b> 92:10 93:2	89:20 90:23	89:20 90:23	45:16,16	33:11 57:7	<b>carried</b> 35:15	<b>clear</b> 66:21
<b>affect</b> 87:10	<b>Anglemeye...</b> 92:10 93:2	90:24 91:1	90:24 91:1	46:13 53:4	57:10 70:22	35:18 36:7	81:21
<b>affirmative</b> 26:21	<b>Anglemeye...</b> 92:10 93:2	91:3,5,5,8	91:3,5,5,8	56:2	87:8,14,17	36:7,9	<b>Click</b> 70:11
<b>afternoon</b> 92:10 93:2	<b>Anglemeye...</b> 92:10 93:2	93:6,18	93:6,18	<b>begged</b> 93:15	88:8,14	<b>carry</b> 84:2	<b>close</b> 34:12
<b>agency</b> 30:4	<b>Anglemeye...</b> 92:10 93:2	<b>background</b> 9:22 31:22	<b>background</b> 9:22 31:22	<b>beginning</b> 1:17	91:15,21	<b>cars</b> 33:1	<b>closer</b> 7:4
<b>ago</b> 9:12	<b>Anglemeye...</b> 92:10 93:2	<b>back</b> 21:16	<b>back</b> 21:16	<b>behavior</b> 18:17	92:7,20	34:5	<b>closet</b> 95:7
10:18 14:9	<b>Anglemeye...</b> 92:10 93:2	61:22 74:3	61:22 74:3	<b>bejesus</b> 39:16	94:19,24	<b>case</b> 88:18	<b>Clyde</b> 17:9
20:7,21	<b>Anglemeye...</b> 92:10 93:2	75:13 83:23	75:13 83:23	<b>believe</b> 25:17	95:12,17,20	94:16	<b>cocktails</b>
58:24 62:18	<b>Anglemeye...</b> 92:10 93:2	84:9 91:1,2	84:9 91:1,2	35:18 36:21	96:19	<b>cash</b> 71:19	95:23 96:3
80:22	<b>Anglemeye...</b> 92:10 93:2	91:5	91:5	42:2 67:17	<b>break</b> 40:19	<b>cause</b> 90:18	96:4
<b>agreed</b> 4:2	<b>Anglemeye...</b> 92:10 93:2	<b>baggies</b> 32:5	<b>baggies</b> 32:5	71:9 94:11	<b>Brian</b> 2:3	90:19 91:6	<b>collect</b> 77:19
5:1	<b>Anglemeye...</b> 92:10 93:2	<b>bags</b> 32:14,19	<b>bags</b> 32:14,19	<b>believed</b> 95:6	5:21 87:8	<b>Center</b> 76:7	<b>collecting</b>
<b>ahead</b> 74:22	<b>Anglemeye...</b> 92:10 93:2	<b>ballpark</b> 20:17	<b>ballpark</b> 20:17	<b>best</b> 62:20	88:8 92:11	<b>certain</b> 31:14	77:15,23
76:2 78:14	<b>Anglemeye...</b> 92:10 93:2	<b>bang</b> 42:3	<b>bang</b> 42:3	<b>Bethlehem</b> 76:7	93:15	95:4	<b>come</b> 49:16
80:11	<b>Anglemeye...</b> 92:10 93:2	<b>based</b> 87:24	<b>based</b> 87:24	<b>beyond</b> 19:14	<b>briefly</b> 5:14	<b>CERTIFIC...</b> 97:1	55:2
<b>ain't</b> 66:8	<b>Anglemeye...</b> 92:10 93:2	<b>bashed</b> 43:13	<b>bashed</b> 43:13	<b>big</b> 41:1	61:15,16	<b>certification</b> 5:3 97:19	<b>coming</b> 33:5
	<b>Anglemeye...</b> 92:10 93:2	<b>basically</b> 10:17 52:13	<b>basically</b> 10:17 52:13	<b>biological</b> 7:24	<b>bring</b> 55:3	<b>CERTIFY</b> 97:2	42:7 43:2
	<b>Anglemeye...</b> 92:10 93:2	<b>authorities</b>	<b>authorities</b>		60:17	<b>certifying</b> 97:23	55:24
	<b>Anglemeye...</b> 92:10 93:2				<b>broke</b> 80:18	<b>chair</b> 40:6	<b>common</b> 32:10
	<b>Anglemeye...</b> 92:10 93:2				90:7		<b>company</b> 11:14
	<b>Anglemeye...</b> 92:10 93:2				<b>broken</b> 89:2		<b>compare</b>
	<b>Anglemeye...</b> 92:10 93:2				<b>brother-in-...</b> 17:5,6		



Joseph Kluska  
November 6, 2020

Page 2

46:20 <b>compartme...</b> 71:24 72:15 <b>complaining</b> 54:10 <b>Complains</b> 89:21 <b>complaint</b> 39:2 89:9 <b>completely</b> 76:13 <b>computer</b> 70:15 79:17 <b>Comunale</b> 11:21 12:23 69:2 84:20 85:8 <b>concern</b> 36:6 96:6 <b>concluded</b> 96:23 <b>concrete</b> 89:19 <b>conduct</b> 14:6 <b>conducted</b> 4:4 6:7 <b>conducting</b> 39:3 <b>confidential</b> 28:7,17 29:9 <b>confirmed</b> 88:16 <b>confirming</b> 4:14 <b>confused</b> 42:14 43:14 50:8 <b>confusion</b> 64:20 <b>construction</b> 11:9,22,24 12:8,23 69:3 84:21 85:8,21 <b>contact</b> 20:11 56:16 57:22 58:16 85:18 86:5 <b>contained</b> 97:4 <b>containers</b> 31:15 <b>containing</b>	30:21 <b>contents</b> 37:23 <b>control</b> 4:8 97:22 <b>conversation</b> 59:2,8 87:24 <b>conversatio...</b> 59:4 <b>convicted</b> 14:2 <b>Coordinated</b> 76:7 78:10 78:11 79:9 <b>cop</b> 60:7,8 65:11,13 <b>cop/bad</b> 60:7 <b>copy</b> 4:19 <b>Coronavirus</b> 86:6 <b>correct</b> 6:14 14:7 93:21 97:7 <b>correctly</b> 82:15 <b>counsel</b> 4:2,5 4:21 5:1 <b>counselor</b> 87:20 <b>COUNTY</b> 1:7 <b>couple</b> 7:2 9:13,14 22:12,13,15 22:17 29:22 60:14 71:4 73:9 <b>court</b> 1:1,21 4:5,9,13 96:12 <b>covered</b> 85:8 <b>crazy</b> 51:6 <b>crew</b> 85:1 <b>criminal</b> 13:23 18:22 19:3,7 <b>crying</b> 61:10 <b>cuff</b> 53:5 <b>cuffed</b> 39:18 39:19,22 40:1,12 44:10 45:9 48:1 54:16	56:13 <b>cuffing</b> 39:20 <b>cuffs</b> 44:13 49:4 53:13 53:14 60:13 61:21 63:9 68:6 <b>currently</b> 8:13,20 9:3 11:11 <b>custody</b> 92:18 <b>cut</b> 65:22 81:4 83:17 <b>cyst</b> 76:16 80:2 <hr/> <b>D</b> <b>D</b> 3:1 <b>D-1</b> 26:10 <b>D-11</b> 3:10 74:10 78:15 89:5 96:20 <b>D-3</b> 29:24 <b>D-4</b> 30:17 <b>D-5</b> 30:20 <b>D-6</b> 32:2 <b>damage</b> 90:20 <b>damages</b> 88:2 88:17 <b>damn</b> 40:17 <b>dark</b> 46:6,13 59:23 60:1 <b>darker</b> 47:4 47:14,17 <b>date</b> 1:17 22:22 80:3 82:21 85:13 85:14 <b>dates</b> 9:12 10:14,21 20:21 21:6 22:6,8,12 71:11 80:16 <b>dating</b> 26:5 <b>daughter</b> 8:1 8:6,8 17:7 25:9 36:18 <b>day</b> 12:18 27:17,18 30:15 38:24 46:12 69:5 83:14,19,20	84:15,16,16 87:3,5 95:3 <b>days</b> 7:2 73:9 81:20 <b>deal</b> 70:17 83:15,16,18 83:20 84:1 <b>dealing</b> 82:10 <b>decades</b> 14:9 <b>decision</b> 35:24 <b>deep</b> 89:23 <b>defendants</b> 1:8 2:11 5:18 <b>definitely</b> 22:22 46:24 81:4 <b>Denies</b> 89:20 <b>dent</b> 41:1 <b>depart</b> 64:24 <b>department</b> 88:24 <b>deposition</b> 1:13 4:3,12 5:20 96:23 <b>depositions</b> 6:7 23:21 <b>describe</b> 81:15 <b>describing</b> 37:4 <b>description</b> 3:9 76:19 85:1 <b>detailed</b> 5:23 <b>details</b> 96:16 <b>detained</b> 68:12 <b>detectives</b> 40:14 <b>different</b> 8:9 42:8 69:21 73:14 <b>direct</b> 97:22 <b>discomfort</b> 80:8 91:7 <b>discovered</b> 95:5 <b>discussion</b> 33:9 62:1 70:20 87:15 88:12 <b>Discussion/...</b>	80:12 <b>disorderly</b> 14:6 <b>distinctive</b> 46:19 <b>distinguish</b> 47:10 <b>distress</b> 88:2 88:17 <b>distribution</b> 20:4 <b>DISTRICT</b> 1:1,2 <b>diverticulitis</b> 80:6 81:18 <b>doctor</b> 69:1 75:4,4 <b>document</b> 74:17 76:6 89:4 <b>documents</b> 76:3,4 <b>dogs</b> 40:12 <b>doing</b> 5:20 12:7 32:23 42:4 70:6 77:10 80:4 80:12 82:6 82:6 87:4 <b>dollars</b> 13:4 <b>door</b> 16:11 16:23 39:15 40:24 41:2 41:5,6,20 41:24 42:12 42:13,16,17 42:18 43:2 43:6,12,21 43:22,24 56:2 <b>doors</b> 42:22 <b>doorway</b> 42:8 <b>double</b> 21:20 <b>downstairs</b> 40:11 55:4 57:12 58:18 60:18 <b>Dr</b> 79:11 <b>drags</b> 60:14 <b>drawer</b> 38:3 <b>driveway</b> 26:17 <b>dropped</b> 51:21	<b>drug</b> 20:4 <b>drugs</b> 20:5 31:14 32:13 67:17 <b>due</b> 69:6 70:1 71:1 73:21 80:5 87:18 <b>DUIs</b> 13:24 <b>duly</b> 5:9 <hr/> <b>E</b> <b>E</b> 2:1,1 3:1,8 <b>e-mailed</b> 4:20 <b>earlier</b> 12:5 68:11 90:22 94:3 <b>early</b> 20:16 39:11 <b>earning</b> 13:1 <b>easiest</b> 39:8 <b>EASTERN</b> 1:2 <b>easy</b> 82:11 <b>economy</b> 12:15 <b>eight</b> 81:20 89:21 93:3 <b>either</b> 8:16 20:10 56:6 <b>embarrass</b> 6:1 <b>emerge</b> 86:6 <b>emergency</b> 88:24 <b>emotional</b> 87:9 88:2 88:17 <b>employment</b> 11:17 <b>empty</b> 30:21 <b>ended</b> 13:18 78:17 82:4 86:10 <b>enforcement</b> 24:13 30:3 94:9 <b>engage</b> 32:17 <b>engaging</b> 18:16 <b>enter</b> 17:19 18:10 <b>entire</b> 11:17 28:16 42:19 59:11,12	65:16,19,20 93:6 94:8 <b>entry</b> 40:14 <b>ESQUIRE</b> 2:3,8 <b>essentially</b> 72:13 <b>established</b> 35:2 39:1 <b>estimate</b> 21:1 <b>estimating</b> 10:22 <b>et</b> 1:5,7 <b>eternity</b> 61:24 <b>event</b> 13:10 <b>events</b> 14:14 74:6 <b>eventually</b> 40:10 57:23 60:16 66:24 67:11 <b>everybody</b> 61:2 62:3 <b>evidence</b> 97:3 <b>exact</b> 9:12 10:14,21 20:21 21:6 22:6,8,11 41:16 67:8 71:11 82:21 85:13,14 <b>exactly</b> 20:8 23:17 36:23 38:23 48:22 52:3 56:18 65:17 67:7 78:7 96:16 <b>examined</b> 5:9 <b>excision</b> 76:16 <b>Excuse</b> 16:4 70:4 <b>excused</b> 96:22 <b>exercises</b> 82:7 <b>exhibit</b> 4:18 4:19,23 26:10 29:24 30:17 96:20 <b>exhibits</b> 4:17 <b>explain</b> 36:3 40:7 44:8	<b>explained</b> 5:21 <b>express</b> 24:12 <hr/> <b>F</b> <b>F</b> 39:24,24 44:6 54:2 59:19 60:6 63:4 <b>face</b> 48:9 49:24 70:7 70:8,19 <b>face-to-face</b> 63:6 <b>faces</b> 45:19 45:23 <b>fair</b> 16:24 19:12,22 21:8,17 29:19 36:9 40:22 46:6 <b>fall</b> 89:1,9 <b>familiarity</b> 14:21 <b>family</b> 17:8 34:8 62:23 <b>far</b> 27:17 35:7 72:20 82:19 94:8 <b>fast</b> 52:1 <b>father</b> 6:8 <b>father-in-law</b> 17:8 36:22 <b>fatigues</b> 45:21 58:9 58:12 62:11 66:15,16 67:1,9,21 <b>February</b> 7:7 9:17,24 11:2 13:9 14:16 20:12 22:4 24:4 24:12 25:3 25:18 27:2 28:6 30:2,6 32:3 34:16 35:1 38:22 46:8,9 69:6 71:15 75:8 75:17 85:14 90:24 <b>feel</b> 75:12 <b>feeling</b> 75:10
--	---	--	---	---	--	--	--

Joseph Kluska  
November 6, 2020

Page 3

<b>feet</b> 41:4 48:19 51:15 <b>fell</b> 89:10,18 <b>felt</b> 52:12 53:20,23 <b>filing</b> 5:2 <b>final</b> 80:11 <b>finally</b> 66:11 73:8 <b>financial</b> 80:6 <b>find</b> 67:14 <b>finding</b> 95:21 <b>fine</b> 10:23 13:5,17 14:22 15:13 16:20 31:3 43:18 57:1 82:2 <b>finger</b> 51:1 <b>finish</b> 62:16 <b>firearms</b> 24:15,17 35:3,5 <b>fired</b> 24:19 <b>first</b> 21:9 40:23 41:12 45:23 53:16 61:8 68:20 68:22,24 74:13 77:3 80:14 <b>five</b> 20:18 57:3 <b>fixed</b> 33:1 <b>fixing</b> 33:1 34:5 <b>floor</b> 2:9 40:3 44:13 50:11 50:13,18,20 51:23 52:5 52:14,14,17 52:20,22 53:22 54:9 54:14 71:24 72:12,16 <b>floorboard</b> 72:10,17,19 72:24 <b>follow</b> 80:13 81:5 <b>follow-up</b> 95:1 <b>following</b> 58:1	<b>follows</b> 5:10 <b>foregoing</b> 97:6,19 <b>form</b> 5:4 92:21 94:20 <b>found</b> 30:2 72:8 <b>four</b> 5:19 14:2,3 20:18 80:1 80:12 93:16 93:17 <b>fracture</b> 90:14 <b>fractured</b> 90:16 <b>freaking</b> 53:22 <b>free-handed</b> 65:21 <b>frequent</b> 23:12 <b>frequently</b> 26:3 <b>Friday</b> 1:11 <b>friend</b> 17:9 34:8 <b>FRIENDS</b> 1:22 <b>front</b> 61:21 65:13,15 66:2,13,13 89:23 93:9 93:13 <b>froze</b> 15:9 <b>fuck</b> 54:1 60:9 <b>fucking</b> 48:16 48:24 <b>full</b> 76:13 <b>full-time</b> 12:10 <b>fully</b> 97:4 <b>fun</b> 91:17 <b>further</b> 4:16 54:13 94:23  <b>G</b> <b>garage</b> 26:16 26:23 27:1 27:7,10,19 27:20,24 28:3,8 30:2 30:10,11,14	31:4 32:4 32:22 33:15 34:12 <b>geared</b> 46:3 <b>general</b> 2:7 28:21 <b>General's</b> 5:16 <b>generally</b> 5:22 18:24 19:9 28:15 63:17 81:15 90:23 <b>getting</b> 9:4 41:14,15 42:4 56:4 64:6 73:4 84:14 <b>give</b> 10:20 59:6 60:9 73:5 77:3 88:21 <b>given</b> 6:2 <b>go</b> 11:17 15:14,22 16:8 20:24 23:9,13 27:9,21 31:4,8,11 33:7,14,15 34:20 37:4 41:19 42:12 47:13 61:12 62:19 68:3 68:13,14 69:5 73:16 76:5 82:7 86:11 87:13 88:10 94:5 94:7,18 <b>goes</b> 42:22,24 43:1,3 83:19 <b>going</b> 5:22,24 6:18 9:15 10:14 14:24 16:19 22:9 26:7 28:13 28:14,17 29:21 31:18 38:18 39:21 40:4,9,19 41:8 44:5,6 44:6,14	45:13 47:4 53:10,10 55:8 56:10 56:11 57:3 58:22,22,24 59:17,19,22 62:2 63:5 67:7,16 68:19 71:10 71:11 74:4 74:6,14 76:2,5,11 78:14 80:10 85:12 86:20 87:10 88:3 89:3 90:11 92:19,23 93:1 <b>good</b> 5:13 7:17 40:18 47:9 57:7 57:14 60:7 84:12 92:10 93:3 96:19 <b>grab</b> 52:3,9 <b>grabbed</b> 39:24 52:7 52:10 <b>grappling</b> 63:13 <b>green</b> 26:11 <b>ground</b> 49:1 51:3,9 <b>group</b> 55:2 94:9 <b>grow</b> 95:6 96:2 <b>guess</b> 10:19 20:15 26:16 39:10 40:13 48:8 53:18 55:12 90:15 <b>guilty</b> 13:17 14:3 96:9 <b>gun</b> 24:19 30:1,5,6,10 35:3,4,12 36:7,8,9,12 36:18,22,24 37:1,3,9,13 37:13,20,21 37:23 38:2 38:14 39:19 44:23 51:17	55:14 <b>guns</b> 25:2,2 35:5,15 36:16 38:7 38:10 <b>guy</b> 36:24 47:8,17,21 48:3,21 49:11 50:17 50:23 57:20 59:7 60:6,7 66:14 <b>guys</b> 46:23 55:2,7 58:9 62:10,15 66:7 93:15  <b>H</b> <b>H</b> 3:8 <b>half</b> 20:18 22:9 40:3 58:23 62:17 <b>halfway</b> 93:16 <b>hallway</b> 41:20 42:23 <b>hand</b> 39:19 <b>handcuff</b> 51:18 <b>handcuffed</b> 48:21 59:10 <b>handcuffs</b> 65:3,4 <b>handed</b> 39:5 <b>handgun</b> 35:14 37:18 <b>handle</b> 12:18 <b>hands</b> 39:18 44:7 45:1,2 45:5,8 47:23 48:16 48:18 51:13 51:14 93:5 93:13 <b>hang</b> 26:8 <b>hanging</b> 32:24 34:5 <b>happen</b> 15:11 <b>happened</b> 38:24 56:18 64:2,9 70:3 73:15 77:2 83:11,11,24 92:24 95:13	96:16 <b>happening</b> 55:23 56:8 62:2 88:5 90:1 <b>happenings</b> 51:6 <b>happens</b> 48:22 61:18 <b>happy</b> 28:20 <b>head</b> 26:20 45:5 48:9 86:20 89:20 <b>headboard</b> 35:22 36:4 38:17 55:14 <b>health</b> 76:7 78:10,11 79:9 87:19 88:4 91:12 <b>hear</b> 6:17 24:8 25:16 <b>heard</b> 42:3 <b>hectic</b> 46:5 <b>height</b> 7:3 <b>held</b> 33:9 60:12 70:20 87:15 88:12 94:9 <b>hell</b> 39:21 59:16 <b>helmets</b> 45:22 <b>help</b> 52:23 81:9 <b>helped</b> 54:17 <b>helpful</b> 50:16 <b>Hey</b> 56:22 <b>high</b> 25:20 <b>highlight</b> 89:7 <b>highlighted</b> 76:12 90:11 <b>Hill</b> 8:14 <b>histories</b> 18:22 <b>history</b> 11:18 19:4,7 <b>hit</b> 52:14,20 54:9 70:5,6 85:20 89:16 89:20 <b>hitting</b> 70:13 <b>hobbies</b>	32:17 <b>hold</b> 66:10,10 66:10 <b>home</b> 16:21 82:7 <b>honest</b> 64:11 <b>Horrible</b> 75:11 <b>hospital</b> 68:4 83:6 94:13 <b>hospitalizat...</b> 80:5 <b>hospitalized</b> 81:11,17 82:23 <b>hour</b> 13:1,3 62:17 70:9 70:12,16 <b>hourly</b> 85:4 <b>hours</b> 65:18 93:3,17 94:10,17 <b>house</b> 9:11 14:21 15:3 17:3,17 24:11 25:6 26:12 34:3 34:8 36:15 36:16 38:10 38:13 39:4 40:12 42:19 43:7,16 63:11 94:16 <b>hunt</b> 38:18 <b>hurt</b> 53:12,14 61:22 <b>hurts</b> 84:15  <b>I</b> <b>icy</b> 89:18 <b>idea</b> 22:14 32:21 <b>identification</b> 96:21 <b>identity</b> 4:15 <b>ignore</b> 60:4 <b>illegal</b> 18:17 <b>imagine</b> 52:6 53:21 55:16 <b>immediately</b> 52:12 <b>improved</b> 84:7 <b>improving</b>	84:8,10 <b>in-between</b> 10:4,8 <b>incident</b> 70:2 72:9 75:8 86:24 87:18 89:14 90:18 92:18 <b>income</b> 77:20 <b>indicate</b> 64:15 76:8 <b>indicates</b> 89:6 <b>indicating</b> 45:3,4,10 79:3 <b>infection</b> 81:19 82:2 <b>informant</b> 28:7 29:9 <b>informants</b> 28:17 <b>information</b> 14:5,10 60:10 <b>ingredients</b> 96:3 <b>initially</b> 57:18,22 58:16 61:10 66:4 73:22 <b>injured</b> 54:13 <b>injury</b> 83:16 <b>inspiration</b> 89:24 <b>instantly</b> 49:2 52:8 53:20 53:20,24,24 <b>instruct</b> 28:18 95:15 <b>instructions</b> 5:23 57:1 <b>insurance</b> 91:12 <b>interacting</b> 56:7 <b>interaction</b> 63:20,23 <b>involve</b> 78:2 <b>involved</b> 20:4 94:15 <b>issue</b> 83:3,5,9 <b>issues</b> 19:10 20:3 75:18
---	---	--	---	--	--	---	---

Joseph Kluska  
November 6, 2020

Page 4

79:18 80:6 86:7,14,15 86:18 88:5 90:24 <b>Italian</b> 47:3	<b>kids</b> 16:1 <b>Kierra</b> 8:7 17:7 18:4 25:9 37:1 <b>Kierra's</b> 37:13 <b>killing</b> 66:9 <b>kind</b> 12:7 43:19 45:5 64:16 65:4 73:5 74:5 82:10 <b>kinds</b> 85:20 <b>Kluska</b> 1:13 2:13 3:3,10 5:8,13 8:7 26:9 74:12 74:14 87:18 88:15 91:16 92:10,13 <b>knee</b> 51:21 <b>kneeling</b> 51:19 <b>knew</b> 19:20 27:20 35:12 72:20,21 <b>knocked</b> 41:2 <b>know</b> 6:17 7:19 9:11 10:14,20,23 16:18 18:16 18:21,24 19:2,3,7,9 19:10,11,12 19:14,15,17 19:21 20:3 20:8,18,20 22:6,8,10 22:15,19,22 23:17 25:14 25:20,24 26:1 27:17 27:23 32:19 32:23 33:24 35:7,9,14 35:15 36:23 36:24 37:3 37:7,12,14 37:15 38:6 38:9 40:23 47:2,7 48:5 49:13 50:7 51:22,23 54:12 55:16	57:14 59:6 60:15 62:19 63:4,13 64:18 65:17 66:11 67:7 68:2 72:2,6 72:15,22 78:6 79:16 80:18 83:12 83:15,24 84:2 85:13 86:22 91:17 92:3 94:8 95:16 96:9 96:12 <b>knowing</b> 40:4 <b>knowledge</b> 19:22 32:10 50:22 94:1 <b>Kunkletown</b> 8:14 10:17	94:4 <b>left</b> 40:14 42:13 49:23 50:11,13 57:18,18 58:5 59:23 59:24 61:6 62:10 65:8 65:22,23 75:1 78:24 79:4 92:14 <b>let's</b> 9:8 11:18 33:7 38:22 88:10 <b>level</b> 15:3,5 15:16 17:15 23:23 63:2 84:24 86:23 <b>LEVIN</b> 2:2 <b>life</b> 84:13 88:5 <b>lift</b> 75:14 <b>lifted</b> 40:2 48:23 <b>light</b> 46:16 <b>lighter</b> 7:6 <b>lights</b> 46:14 <b>limited</b> 84:1 85:2 <b>line</b> 28:16 <b>list</b> 61:3 <b>Listen</b> 22:16 <b>listening</b> 66:8 <b>lit</b> 60:12 <b>literally</b> 39:15 42:4 <b>little</b> 32:5,14 35:14 36:18 40:20 41:9 45:24 46:1 47:4,14 53:7 63:12 77:7 <b>live</b> 8:13,16 8:23 9:9 10:9 21:5 34:7 <b>lived</b> 9:1,5,6 9:13 21:3 63:11 <b>lives</b> 23:5 <b>living</b> 9:17,17 9:24 10:12 11:3,8	14:16 15:15 17:3 20:7 20:17 21:9 21:13,14,18 22:14 25:5 60:21 61:4 63:1 64:5 64:23 65:19 66:4,6,22 67:5 94:7 <b>local</b> 30:3 39:5 65:11 65:12 <b>locals</b> 92:14 92:18 <b>locations</b> 4:7 <b>lock</b> 16:10,23 <b>locked</b> 16:3,5 16:12 37:11 <b>long</b> 7:15 9:1 10:11 12:1 20:7,21 21:7 57:11 58:20 62:8 62:9,12,13 62:18 65:17 65:18,18 67:7,8 69:14 80:22 81:16 84:14 92:17 93:11 <b>longer</b> 37:20 37:21 <b>look</b> 18:1,11 23:15 31:8 <b>looked</b> 64:11 <b>looking</b> 40:15 48:12 <b>looks</b> 74:21 76:1 <b>loose</b> 81:4 <b>lot</b> 16:17 27:16 31:1 33:2 68:7 69:16 72:1 <b>loud</b> 64:6 <b>lower</b> 15:3 23:23 63:1 <b>Luchetti</b> 79:11,12,13 <b>Luke's</b> 89:8	<b>maintained</b> 86:4 92:17 <b>male</b> 79:24 <b>man</b> 49:5 83:17 <b>March</b> 71:12 71:14,15 73:5,19 74:18 85:14 <b>marijuana</b> 13:9,13,14 68:9 95:6 96:2 <b>Mark</b> 17:5 18:15 19:1 19:24 22:23 23:7 27:15 28:8 31:11 32:17,22 33:16 38:7 94:11,12 <b>marked</b> 4:17 26:10 29:23 30:20 74:10 74:10 96:20 <b>married</b> 7:12 7:15 <b>master</b> 42:11 <b>materials</b> 95:22 <b>matter</b> 97:6 <b>matters</b> 49:13 <b>maze</b> 43:19 <b>mean</b> 15:24 17:22 24:24 36:17 47:7 50:7 51:16 51:22,24 52:9 53:21 56:17 57:19 59:5,7 62:17 63:6 64:18 75:21 81:3 83:15 83:17,24 84:1,2 86:22 <b>means</b> 69:19 97:21 <b>medical</b> 3:10 68:1,17 73:1 74:7,8 74:11	<b>meeting</b> 4:8 <b>member</b> 34:9 <b>members</b> 62:23 <b>memory</b> 62:20 <b>men's</b> 56:23 <b>mental</b> 87:19 88:4 <b>mentioned</b> 18:14 90:22 <b>met</b> 5:14 <b>metal</b> 43:12 <b>meth</b> 28:7 29:9,16 <b>Michele</b> 1:15 97:13 <b>mid</b> 69:17 <b>middle</b> 71:14 <b>minus</b> 10:18 <b>minute</b> 67:8 70:4,15 <b>minutes</b> 57:3 57:15,15 59:1,3 60:17 64:21 84:12 <b>mischaracter...</b> 33:13 <b>missed</b> 41:22 <b>Mm-hmm</b> 72:14 81:12 <b>models</b> 37:14 <b>Molotov</b> 95:22 96:3 96:4 <b>moment</b> 39:10,12 54:9 <b>money</b> 72:3,4 72:5,21 <b>month</b> 69:18 <b>months</b> 9:3 10:18 22:13 28:6 71:16 80:1,12 <b>morning</b> 5:13 39:10 46:4 65:20 80:8 84:12 92:24 <b>mother-in-l...</b> 6:8,12,14 17:7 93:19 93:23	<b>mouth</b> 60:12 64:7 <b>move</b> 38:22 66:1,12 68:19 75:15 <b>moved</b> 9:13 10:16,18,19 21:9 22:2 22:20,24 50:18 51:2 51:7,9 52:4 54:13 66:13 90:9 <b>movement</b> 89:23 <b>moving</b> 84:14 <b>MRI</b> 73:4 74:17,24 77:12 <b>MRIs</b> 75:5 <b>Murphy</b> 1:15 97:13
<b>J</b> <b>J</b> 2:3 <b>January</b> 69:17,17 71:15 <b>jeans</b> 54:20 <b>Jeff</b> 17:6,10 18:15 19:6 63:14 64:6 64:7 <b>Jeffrey</b> 19:22 21:2 23:21 38:9 <b>JFK</b> 2:4 <b>jibe</b> 24:1 <b>job</b> 74:2 75:6 75:14 85:1 87:1 <b>Joe</b> 29:5 87:9 91:23 <b>John</b> 25:13 <b>Joseph</b> 1:13 3:3,10 5:8 74:12 <b>July</b> 80:5 81:11 83:1 <b>jumped</b> 39:17 48:12 51:12 <b>June</b> 7:16	<b>K</b> <b>kbradford...</b> 2:10 <b>keep</b> 27:6 33:19 37:8 <b>kept</b> 35:17,21 36:18 37:2 39:23 53:11 53:12 54:6 65:11 94:1 94:16 <b>Kevin</b> 2:8 5:14 28:18 31:23 58:22 70:4 84:16 <b>kicked</b> 41:24 43:5	<b>L</b> <b>L</b> 1:15 97:13 <b>lack</b> 70:1 71:1 73:22 <b>laid</b> 51:1 69:10,14,19 70:24 71:4 77:18,22 85:24 <b>Landed</b> 89:19 <b>Lane</b> 1:22 8:14 <b>language</b> 53:23 <b>large</b> 34:15 71:18 <b>late</b> 80:5 <b>law</b> 24:13 30:3 94:9 <b>lawsuit</b> 5:18 6:3 <b>lawyers</b> 28:21 <b>laying</b> 42:6 44:16 45:6 48:11 49:21 50:7,9 <b>learn</b> 67:11 <b>leave</b> 16:21 16:23 38:20 55:1 67:1	<b>M</b> <b>mail</b> 68:15	<b>N</b> <b>N</b> 2:1 3:1 <b>name</b> 5:13 8:3,4 25:12 25:14 90:3 <b>named</b> 5:17 <b>names</b> 61:3 <b>nasty</b> 69:17 <b>neck</b> 70:8 89:20 <b>need</b> 4:11 41:10 <b>needed</b> 80:13 81:5 <b>negative</b> 24:12 <b>negatives</b> 21:21 <b>nervous</b> 59:9 <b>never</b> 29:13 31:12 35:2 36:5,22 37:12 43:16 46:11 69:18 75:23 <b>NEWTOWN</b> 1:22 <b>night</b> 38:15 55:15 80:9 89:10 <b>nighttime</b>			

Joseph Kluska  
November 6, 2020

Page 5

35:23 <b>ninth</b> 90:14 <b>noise</b> 31:22 <b>non-issue</b> 90:6 <b>non-stop</b> 12:11 <b>normally</b> 16:2,5 <b>NORTHA...</b> 1:7 <b>nose</b> 70:19 <b>Notary</b> 1:16 <b>note</b> 82:13 <b>noted</b> 21:23 29:3 <b>notes</b> 80:7 90:12 97:5 <b>notice</b> 1:14 <b>notified</b> 90:13 <b>November</b> 1:11 88:24 89:8 90:2 90:12 <b>number</b> 20:24	67:20 <b>Oh</b> 16:7 42:18 43:9 68:18 81:14 <b>okay</b> 6:4,6,10 6:13,16,19 7:1,3 8:2,6 8:20 9:8,16 10:6,16 11:2,6,13 12:17 13:22 14:5,13 15:11,22 16:10,16,24 17:22 18:14 19:6,16,24 20:2,14 21:8 22:1 22:11,21,23 23:15,17 24:4,8,23 25:3 26:2,9 26:15,19,24 28:11 29:1 29:4,13,18 29:21 31:18 32:22 33:24 34:11 35:11 35:16,20 36:20 37:1 37:7,11,22 38:6,22 40:18,20 41:8,12 42:7,14 43:9,11,14 43:23 44:11 44:16,20 45:11,18 46:2,18,23 47:9,19,22 48:5,15,20 49:18,24 50:4,15 51:2,7,16 52:2,13,19 53:6 54:8 55:5,8,11 55:17,22 56:3,6,15 57:16 58:7 58:10,15 59:2,13 60:16 61:5	61:14,17 62:1,9 64:22 65:3 65:24 67:11 67:24 68:5 68:11,16 69:12 70:7 70:9 71:13 71:21 72:23 73:13,18,21 74:4,21 75:3,7,17 76:1 77:8 77:12 78:11 79:4 80:4 80:17 81:3 81:21,24 82:4,12 83:5,13,22 84:6,17 85:4 86:14 86:21 87:7 87:23 88:21 90:9 91:4,6 91:14 92:12 92:16 95:17 96:17,17,18 <b>old</b> 6:21,22 8:3 9:20,21 10:1,12 11:3 14:17 25:18 <b>once</b> 52:20 62:3 64:18 65:11 73:24 <b>ones</b> 58:11,12 <b>open</b> 23:23 38:14 50:11 50:13 76:13 80:1 83:17 <b>opened</b> 40:24 <b>opens</b> 43:24 <b>operation</b> 95:7 96:3 <b>outcome</b> 13:15 <b>outdoors</b> 43:10 <b>outside</b> 39:15 42:17,24 43:1,4,7,12 43:21 46:7 46:11 69:24 95:10	<b>owned</b> 24:17 35:2 <hr/> <b>P</b> <hr/> <b>P</b> 2:1,1 <b>p.m</b> 96:24 <b>PA</b> 2:4,7,9 90:12 <b>page</b> 3:2 74:13 79:23 80:11 90:10 <b>pages</b> 74:22 <b>paid</b> 13:17 <b>pain</b> 49:3 68:2,7 89:13,21,21 91:6 <b>pair</b> 54:20 <b>pandemic</b> 12:4 85:13 85:20 86:8 86:17,19 <b>part</b> 39:3 83:7 90:11 91:18 <b>partially</b> 47:10 78:24 <b>participate</b> 50:23 <b>participating</b> 4:7 <b>particular</b> 19:8,11 <b>parties</b> 4:3 <b>parts</b> 76:12 <b>passed</b> 67:3 93:11 <b>Patient</b> 89:10 90:13 <b>paved</b> 26:17 <b>Pennsylvania</b> 1:2,22 8:15 <b>people</b> 15:1 15:24 25:4 33:24 34:3 34:4 67:22 85:24 93:24 94:9 95:13 <b>perform</b> 75:6 <b>performed</b> 76:12 <b>period</b> 10:4,8 93:6 <b>person</b> 25:9	<b>personal</b> 86:7 86:14,18 91:22 <b>perspective</b> 38:24 <b>Philadelphia</b> 2:4,9 <b>photograph</b> 26:7 30:1 32:3 <b>photographs</b> 30:14 31:20 <b>physical</b> 12:13,16 63:21 77:24 78:3,5,8 82:4,8 <b>physicality</b> 63:24 <b>physically</b> 56:17 86:22 <b>pick</b> 52:10,15 <b>picked</b> 52:16 52:21 54:16 73:23 <b>Picks</b> 40:4 <b>picture</b> 31:19 <b>pictures</b> 29:22 <b>pink</b> 37:15,16 <b>pipe</b> 13:13 <b>place</b> 4:11 10:17 40:17 62:14 <b>placed</b> 56:17 <b>plaintiffs</b> 1:5 2:6 5:19 <b>plans</b> 86:11 <b>please</b> 53:9 61:21 92:16 <b>pled</b> 13:17 14:2 96:9 <b>point</b> 12:8 20:8 22:1 28:5 29:7 39:6 48:6 51:22 53:8 54:23 56:7 57:16 61:2 61:6 64:24 65:6 68:16 73:1 78:16 81:11 84:18 84:24 91:12	<b>pointed</b> 44:23 <b>Pointing</b> 51:17 <b>poking</b> 33:22 <b>police</b> 20:11 24:5,13 28:9 30:3 39:2 41:23 66:17 67:9 67:23,24 68:13 95:21 <b>possession</b> 4:21 13:12 13:14 20:4 68:9 <b>possible</b> 35:8 <b>possibly</b> 19:20 <b>post-op</b> 80:13 <b>posterior</b> 89:19,22 <b>pounced</b> 56:1 <b>prefer</b> 28:21 <b>preference</b> 28:24 <b>present</b> 2:12 4:3 6:6 20:10 93:24 <b>presented</b> 4:19 <b>presenting</b> 4:18 79:22 <b>presents</b> 79:24 <b>pretty</b> 50:1 62:8 <b>prevent</b> 79:3 79:5 <b>Prevention</b> 79:6 <b>prior</b> 4:22 <b>probably</b> 7:11 12:2 17:1 20:20 46:16 57:14 58:24 62:14 62:16 65:17 65:18 69:15 81:7 84:11 85:23 93:1 93:2,16,16 <b>problem</b> 24:23 <b>problems</b>	75:21,23 <b>procedure</b> 76:12 78:2 91:18 <b>proceeding</b> 88:17 <b>proceedings</b> 97:3 <b>process</b> 9:4 9:15 68:14 <b>professional</b> 1:16 87:19 <b>progress</b> 90:12 <b>property</b> 26:8 65:16 65:21 93:20 <b>provider</b> 79:10 <b>psychiatrist</b> 87:21 <b>psychologist</b> 87:20 <b>Public</b> 1:16 97:14 <b>pull</b> 34:13 61:21 73:17 <b>purse</b> 35:19 <b>pursuant</b> 1:14 <b>pursuing</b> 88:1 <b>put</b> 7:5 9:8 35:24 39:17 41:1 44:7,9 45:1,2 48:16,18 51:13,14 64:7 65:13 65:14 67:8 93:9	24:24 62:7 76:3,5 88:3 92:4 95:10 <b>quick</b> 7:17 51:5 52:1 56:23 <b>quite</b> 11:4 77:6 <b>quiz</b> 11:1 <hr/> <b>R</b> <hr/> <b>R</b> 2:1 <b>radiation</b> 89:22 <b>rate</b> 85:4 <b>re-check</b> 79:24 <b>read</b> 76:11 79:22 89:15 89:17 90:11 <b>reading</b> 5:2 <b>ready</b> 41:15 42:5 56:5 <b>real</b> 8:18 14:8 20:6 31:21 34:10 56:23 59:8,8 69:17 74:3 75:13 95:4 <b>realized</b> 73:24 <b>really</b> 12:12 19:18 22:7 31:8 34:12 36:5,6 49:13 55:18 63:14,14 71:16 86:17 96:8,13 <b>reason</b> 12:13 29:14 64:13 67:17 83:7 <b>recall</b> 80:14 80:16 83:1 89:11 92:13 95:18,21 96:15 <b>recess</b> 57:9 <b>recognize</b> 9:22 <b>recollection</b> 24:2 89:5 90:5 <b>record</b> 14:11
---	---	---	--	---	---	---	--



Joseph Kluska  
November 6, 2020

Page 6

28:20 33:8	<b>removal</b>	<b>Richard</b> 17:8	54:3,18	<b>S</b>	30:10,19	83:9,10	<b>skinnier</b>
33:10 70:21	76:16 80:2	37:22	78:23,23	<b>S</b> 2:1 3:8	36:17 38:14	<b>shoulders</b>	46:20
74:9,15	<b>removed</b> 65:6	<b>rifle</b> 37:17,19	<b>Road</b> 9:18,20	<b>S-H-A-N-T...</b>	45:18,23	48:24,24	<b>skip</b> 14:23
87:13,16,24	65:10,10	<b>rifles</b> 35:5	9:21 10:1	25:17	48:8,9	49:2,5,6,7	<b>slammed</b>
88:11,13	93:20	<b>right</b> 6:10 7:4	10:12 11:3	<b>S/P</b> 80:1	64:12 66:24	53:12,13	40:2 44:13
<b>records</b> 3:10	<b>Renae</b> 2:13	7:13 8:11	14:17 24:5	<b>safe</b> 36:22	70:7,7,8,19	54:1,1,3,3,4	49:1 50:20
74:7,8,11	6:13 7:12	8:18 9:18	<b>roll</b> 39:17	37:9,23,24	74:19,20	54:10 61:22	52:17 53:22
78:13 79:8	14:17 15:15	9:19,21	44:3,3,4,4	<b>Saint</b> 89:8	81:8 90:19	66:7,7,9	<b>Slams</b> 53:2
80:24 81:9	41:12 42:1	11:11 12:20	44:17 47:20	<b>salary</b> 12:22	<b>seek</b> 68:16	68:17,21	<b>sleep</b> 15:18
<b>recovered</b>	55:22 57:23	15:4 19:19	48:13,16	<b>sat</b> 40:8,11	87:19	73:2 74:1	<b>sleeping</b>
71:22	60:18	21:19 23:5	50:9,12	53:4 56:12	<b>seen</b> 30:5,13	75:9,19,24	46:17
<b>recovery</b>	<b>Renae's</b> 8:8	26:12,19	51:12	58:4 61:19	30:23 31:12	81:22 82:6	<b>sleeps</b> 80:8
78:1,20,21	<b>rented</b> 9:14	31:6,7,15	<b>rolled</b> 44:4	62:8 93:12	32:7 37:23	83:13 90:20	<b>slide</b> 52:13
79:2,4	10:6	31:23 32:1	44:22,24	93:17	48:19 96:2	<b>show</b> 26:7	<b>sling</b> 77:3,8
<b>recuffed</b>	<b>repair</b> 76:13	32:2 34:20	48:14,18	<b>saying</b> 19:19	<b>segued</b> 12:7	29:21 31:18	<b>Slipped</b> 89:17
93:14	76:24 80:2	35:1 36:3	<b>roofing</b> 69:23	22:12 37:5	<b>selected</b> 74:7	74:6 76:2,4	<b>slowly</b> 84:7
<b>red</b> 26:15	<b>report</b> 25:23	39:8,13,13	91:2	41:6 44:1,1	74:11	89:3,4	<b>slows</b> 69:23
<b>Ref</b> 3:9	<b>reporter</b> 1:16	41:19,21	<b>room</b> 6:11	44:3 51:8	<b>selling</b> 29:16	<b>showed</b> 39:3	69:24
<b>refresh</b> 89:4	4:5,14	42:2,9,11	15:23 16:7	53:7,11,12	<b>senior</b> 25:20	67:22	<b>small</b> 13:14
<b>refused</b> 49:4	97:23	42:16 44:5	16:12,21	53:18 54:8	<b>sense</b> 26:13	<b>shower</b> 41:15	32:18,19
<b>regarding</b>	<b>REPORTE...</b>	44:19,20	17:13,14,19	61:20 63:18	49:18 73:7	<b>showing</b> 26:9	76:16
4:23	1:21	45:7 47:6	17:20,21	64:7 74:14	73:19	29:23 30:17	<b>smoke</b> 59:9
<b>Registered</b>	<b>Reporting</b>	48:7,20	18:1,5,6,11	88:7	<b>separate</b> 4:6	30:19 32:2	59:14
1:15	4:9	49:12,19,22	23:7,9,14	<b>says</b> 70:8	<b>September</b>	74:13 79:8	<b>snoop</b> 18:13
<b>rehab</b> 91:11	<b>represent</b>	50:3,5,6,6	23:22 29:10	76:20 80:11	79:10 80:20	79:19	<b>sold</b> 29:8
<b>relate</b> 88:4	26:11 29:24	50:11,13	36:13,19	80:22 81:4	81:7 82:13	<b>shows</b> 74:24	31:15 32:13
<b>relating</b>	32:4	52:8,12,18	37:2,9 38:7	81:6 89:9	82:17 84:6	<b>shut</b> 39:23,24	<b>son</b> 8:10,11
74:12	<b>representing</b>	52:19 53:3	40:8,11	90:2,9,13	<b>sequence</b>	40:7,7,8	17:6,10
<b>relationship</b>	2:6,11 5:16	53:16 55:1	54:23 55:10	<b>scale</b> 30:13	74:6 85:9	44:15,15,15	<b>soon</b> 8:19
8:9	<b>reproduction</b>	55:8 56:21	56:23 57:12	<b>scared</b> 39:16	<b>serious</b> 51:6	49:8,8,8,9	61:9
<b>released</b> 68:6	97:20	57:2,5,24	57:17,18,24	<b>scenario</b> 60:7	83:16	53:11,15,15	<b>Sore</b> 91:5
93:13 94:2	<b>request</b> 68:1	58:1 59:15	58:4,11,17	<b>school</b> 25:20	<b>sets</b> 40:4,6	53:15 54:6	<b>sorry</b> 8:11
<b>relevance</b>	<b>requesting</b>	59:17,18	58:20 60:20	<b>scope</b> 95:10	<b>settled</b> 45:24	54:7 60:5,9	13:4 15:6
28:15	74:17	60:14,22	60:21,22	<b>scream</b> 48:24	<b>seven</b> 10:13	85:20 86:2	15:10 21:16
<b>remain</b> 57:11	<b>reserved</b> 5:5	61:9,12,13	61:1,4,14	<b>screen</b> 15:9	10:15,17	<b>side</b> 26:16	31:21,21
58:16 62:9	<b>respect</b> 88:18	61:17 64:4	61:23 62:2	33:5 70:5	20:16 93:3	49:12,14,15	41:9 42:21
<b>remained</b>	<b>respond</b> 60:2	65:7,9	62:6,8,10	74:4	94:10,17	49:16,17,19	53:23 66:19
59:10 77:13	<b>rest</b> 36:15,16	66:12,19	62:24 63:1	<b>scroll</b> 76:2	<b>shakes</b> 26:20	49:19,20,22	66:20 79:13
85:18	93:24	67:1 74:18	64:5,21,23	78:14 80:10	<b>Shantz</b> 25:15	49:23	81:14 85:8
<b>remember</b>	<b>restart</b> 33:6	75:2,15	65:19 66:4	<b>se</b> 23:22	25:17	<b>signing</b> 5:2	92:3,5
14:12,13	70:9	76:14,17,21	66:6,22	<b>sealing</b> 5:2	<b>share</b> 74:4	<b>simple</b> 14:6	<b>sort</b> 62:22
22:8 34:12	<b>restrained</b>	77:24 78:20	67:5 71:18	<b>search</b> 39:3,4	<b>shit</b> 23:12	<b>single</b> 84:12	64:15
39:6 55:18	94:16 95:13	78:23 79:4	72:13,19	<b>searching</b>	<b>Short</b> 57:9	84:15	<b>sought</b> 73:1
55:20 56:18	<b>return</b> 82:16	79:19 80:1	94:5,7	40:16 65:16	<b>shorter</b> 47:1	<b>Sir</b> 88:21	<b>sounds</b> 43:19
63:16,17	82:20 84:23	81:8 85:12	95:23 96:4	65:21 67:19	47:13 50:23	<b>sit</b> 56:12,14	75:2
68:20 69:15	86:5	85:15 86:4	<b>rough</b> 56:19	<b>seasonal</b>	60:8	56:15 61:17	<b>source</b> 77:20
71:11 80:17	<b>returned</b>	89:15,19,22	71:16	77:19	<b>shortly</b> 22:4	<b>sitting</b> 61:23	<b>Specialty</b>
80:19 82:18	80:7 82:15	90:14,16	<b>RPR-Notary</b>	<b>seat</b> 56:17	66:3	64:19,22	76:6
82:19,21	82:18	92:1,8 94:6	97:14	<b>second</b> 15:9	<b>shoulder</b>	<b>situation</b>	<b>specifically</b>
86:3 89:2	<b>returning</b>	<b>ripped</b> 29:11	<b>ruckus</b> 40:9	41:3 52:18	53:17 74:18	12:15	18:23
96:1	84:17	44:12 49:6	<b>running</b> 56:2	88:21 92:2	75:1,5	<b>six</b> 65:18	<b>specifics</b>
<b>remote</b> 4:6	<b>rib</b> 89:2,19	49:6 51:24	59:20	<b>section</b> 79:23	76:17,22	94:10,17	19:17,21
<b>remotely</b>	90:7,14	52:8,11,23	<b>RV</b> 34:22	<b>see</b> 27:19	78:20,22	<b>skinned</b> 47:4	<b>spelled</b> 11:23
4:13	<b>ribs</b> 89:22	52:24 53:21		28:2 30:6	80:1,4,9	47:14	<b>spend</b> 27:16



Joseph Kluska  
November 6, 2020

Page 7

30:24 31:5 33:2 spent 20:15 31:1 spoke 88:15 stamp 74:23 stamped 74:16 standing 48:7 48:19 50:2 50:24 51:8 51:9,11,14 stands 53:1 start 11:18 19:1 59:19 62:16 started 5:15 6:18 40:15 40:16 62:5 73:24 75:9 starting 70:23 startled 39:22 state 5:17 39:2 86:2 states 1:1 80:3 station 68:13 status 88:4 stay 17:12 26:4 staying 23:22 25:10 26:2 Steep 8:14 stenographic 97:5 step 89:10,18 steps 42:24 43:2,4 89:20 stepson 7:24 8:2 96:14 stipulated 4:1 4:16,24 stomach 44:24 45:2 45:8 50:10 50:12 81:19 82:3 83:3,5 83:9 stop 12:3 16:1 33:17 85:7	stopped 13:2 84:7 Street 2:9 Strehlow 1:21 4:9 stuff 16:1 33:1 34:5 34:17 40:14 55:12 63:13 84:3 subject 71:7 subscapula... 76:15 80:2 suit 66:14,17 66:17 Suite 1:22 2:4 suits 58:5,8 62:4 64:24 65:2 summarize 9:10 summary 40:18 superior 76:16 supervision 97:22 sure 5:21 14:8 20:6 21:6 22:20 25:19 31:17 34:2,10 surgery 76:8 76:21 77:2 77:13 78:20 78:22 79:3 79:5 80:3 91:11 Surgical 76:6 surprised 29:18 suspect 29:14 swearing 54:2 swiftly 67:10 switched 67:9 sworn 4:13 5:9 <hr/> T T 3:8 T-shirt 54:21 table 40:5 53:3,4	take 10:20 11:16,19 39:9 49:3 53:13,14 54:23 57:2 57:3 60:13 60:13 taken 1:13 30:15 32:3 57:12 94:11 94:12 97:5 takes 50:1 70:14 84:11 84:13 talk 26:22 31:11 33:15 38:23 55:12 96:7,13,14 talked 53:6 55:3 68:8 68:11 84:17 talking 42:18 62:6 64:1,4 70:24 tall 46:24 47:8,21 48:2,21 50:17 59:7 taller 46:20 46:22 47:13 team 40:14 tear 76:14 technical 76:19 technically 87:1 tedious 41:9 teeth 61:11 61:11,11 tell 8:2 9:2 12:24 44:14 53:9 60:8 90:23 92:16 telling 39:23 54:6 60:5 66:8 ten 89:21 tendon 76:15 76:24 testified 5:10 37:22 testimony 33:14 38:12 thank 32:16	91:16,23 94:22 Thanks 40:19 57:5 therapist 78:9 79:9 therapy 78:1 78:3,5,16 78:19 79:1 79:1,21 80:5,15 82:5,8 thick 41:23 thickness 76:14 thing 18:10 31:19 48:2 52:22 57:4 59:21 67:18 68:20,22,24 70:18 71:17 77:19 81:6 87:4 things 32:24 33:1 45:24 63:15 74:15 86:16,19 think 7:20 25:8,19,22 35:10 39:8 51:1,20 56:13,19 58:3 66:16 66:21 67:6 78:12,13 81:20 85:11 88:16,22 90:15 91:15 thinking 51:18 thought 90:7 three 14:2,3 74:22 93:16 93:17 threw 49:23 thrown 14:4 tie 40:1 65:3 65:5 66:17 tied 45:3,10 65:15 93:5 93:10,14 ties 52:6,7,10 52:24 65:23 tight 26:8	time 5:5 17:4 17:22 18:8 20:21 21:2 22:16 23:3 24:9 26:3 27:16,18 31:1,6 33:3 33:6 34:6 36:11,13 38:4,9 39:23 40:13 41:16 42:3 44:12 45:1 51:1 58:17 59:11,12 61:15,20 62:6,8,18 65:18,20,22 66:5 67:3 68:2 69:3 69:11,16 71:6,8 73:14,15 75:7,8 80:15,22 82:24 84:14 85:11,24 91:17 93:7 93:11 96:15 timeframe 67:4 timeline 94:2 times 14:3 17:1 31:5 69:16 77:21 78:6 today 5:20 6:11 83:13 92:11 told 25:5 30:24 44:17 48:13 51:12 55:24 59:17 63:23,24 93:8 tools 27:3,5 34:24 top 89:6 90:3 tore 78:24 torn 76:24 totally 78:23 91:19 touched 44:22	tractor-trai... 34:23 tractor-trai... 34:18 trailer 34:11 34:21 transcript 97:7,20 trial 5:6 tried 59:5 73:11,16 Trinkley 8:4 95:2 trooper 48:6 troopers 5:17 45:14,14,15 46:19 56:6 57:17,21 58:3,15,21 62:10,13,24 63:10 64:15 64:23 66:24 67:21 92:14 true 97:6 try 59:13 68:22 79:2 82:9 trying 51:19 58:3 70:9 85:9 92:7 turn 42:13 79:16 turned 48:10 TV 31:16 32:10 two 6:7 9:3 10:18 18:14 22:9 37:3 40:5 42:22 45:17,18 46:19 47:11 55:7 57:17 57:21 58:3 58:15,21,23 71:16 84:10 Tyler 8:4,8 17:6,12 37:2 95:2 type 35:12 37:13 typically 15:23 16:14 16:15 35:16 37:8 55:19	77:18 <hr/> U uncomfort... 6:2 underneath 72:12,20,21 understand 6:16 13:8 16:20 20:23 31:5,14 32:9 37:14 41:11 49:5 50:6 52:2 53:17 71:21 88:6 91:20 93:19 95:14 understand... 15:2 21:1 23:20 25:4 27:15 76:18 85:19 86:1 87:23 Understood 79:7 unemploy... 77:15,20,23 UNITED 1:1 unlocked 17:1 unshare 92:6 unusual 34:7 upper 15:5 15:16 17:15 75:18 76:14 upset 63:14 upside 74:23 use 32:18 56:22 usually 71:4 71:10,15 <hr/> V vaguely 89:12 vials 30:21 32:19 videoconfe... 1:14 2:3,8 2:13 4:4,8 VIDEOGR... 1:21 view 87:12 visit 34:1,3	79:9 visualize 50:14 vs 1:6 <hr/> W wait 70:9,11 70:16 74:22 92:2 waived 5:3 wake 40:24 walk 74:5 walked 42:2 58:4 walking 38:13 wall 49:15,17 49:20,22 50:10,12 want 10:13 11:17 26:22 28:19 33:13 38:23 47:2 50:8 55:9 62:15 64:6 70:16 71:17 81:10 88:23 wanted 63:9 68:6 wanting 63:4 63:4 warrant 39:4 wasn't 16:2,2 16:5,8 20:7 23:11 27:22 36:6 47:2 47:16 54:17 62:12,12 63:8 64:20 71:2 72:17 73:15 watching 31:16 32:10 way 9:8 39:9 54:16 56:22 79:14,15 we'll 12:20 15:14 19:1 20:16,23 47:13 74:10 81:8 84:6 we're 5:20 6:18 9:4,15 58:2 71:7
--	---	---	--	--	---	---	--

Joseph Kluska  
November 6, 2020

Page 8

<b>weapons</b> 27:24 28:2	<b>witness' 4:14</b>	<b>wreck 59:9</b>	9:2,5,6,12	<b>11 12:2</b>	90:24	<b>8</b>
<b>wearing</b> 45:19,20,21 54:19,20 77:8	<b>witnesses</b> 92:4	<b>wrecked</b> 62:14	9:13,14	<b>11:40 57:6,7</b>	<b>2020 1:11</b>	<b>814 79:23</b>
<b>weather 71:3</b> 71:3	<b>woke 39:11</b> 41:2	<b>wrong 14:11</b> 79:14	10:13,15,17	<b>116 1:22</b>	<b>21 17:23</b>	<b>9</b>
<b>week 78:6</b>	<b>woken 39:12</b>	<b>wrote 82:14</b>	12:2 20:16	<b>12 12:2</b>	<b>210 7:4,5,6</b>	<b>92 3:4</b>
<b>weeks 28:6</b> 71:4	<b>word 63:16</b> 63:16 90:16	<b>www.strehl...</b> 1:24	20:19 22:9	<b>12:27 96:23</b>	<b>215 1:23</b>	<b>94 3:3</b>
<b>weight 7:3,5</b> 7:9	<b>worded 21:17</b>	<b>X 3:1,8</b>	22:13,16,17	<b>14th 79:10</b> 82:13,17	<b>215-546-0340</b> 2:5	
<b>weird 21:17</b>	<b>words 63:13</b> 64:7	<b>Y</b>	22:18 58:23	<b>15 57:14,15</b> 58:24 59:3	<b>215-560-2402</b> 2:10	
<b>went 20:8</b> 36:10 38:16	<b>work 5:15</b> 11:6,13	<b>yanked 52:11</b>	84:11 91:2	<b>15,000 71:22</b> 72:9	<b>22 24:21</b>	
51:23 55:7	12:1,10,11	<b>yeah 9:7</b> 10:20,21	yelling 47:19	<b>1500 2:4</b>	<b>22nd 73:5,20</b> 74:18	
58:13 68:24	16:17 22:17	11:5 12:9	49:9,10	<b>16 18:7</b>	<b>23 8:5 17:23</b>	
71:8,9 73:8	33:17 41:15	16:1,7	56:9 63:10	<b>1600 2:9</b>	<b>23rd 20:12</b> 22:5 24:4	
75:3 78:10	42:5 56:5	18:12 19:10	<b>Yep 6:20</b> 8:22 9:23	<b>17 18:7 25:20</b>	24:12 25:3	
80:15 88:24	69:5,6,20	20:1,22	10:5,24	<b>18 25:21,22</b>	28:6 30:2,6	
96:11	70:1,3 71:1	25:1,24	12:6 39:7	<b>18058 8:15</b>	32:4 34:16	
<b>weren't 14:20</b> 24:9 33:12	71:8,9 73:8	26:4 28:10	40:21 60:19	<b>185 7:11</b>	38:22 69:6	
33:22 58:9	73:16,22,23	29:10,20	66:23 69:13	<b>18940 1:22</b>	75:8,17	
73:21 94:4	75:9 77:13	34:18 35:4	72:11 76:10	<b>18th 89:8</b> 90:2,12	<b>28 13:1,3,4</b>	
<b>whatsoever</b> 18:22	80:7 82:9	36:11,11	76:10 84:19	<b>19 8:7</b>	<b>2nd 76:9</b>	
<b>white 46:23</b> 47:1,3,17	82:15,16,18	37:3,21	yesterday 6:6	<b>19-3714 1:8</b>	<b>3</b>	
47:21 48:3	82:20 83:4	39:12,14	6:7 9:22	<b>190 7:11</b>	<b>3/29/18 75:1</b>	
48:21 49:11	83:7 84:18	41:7 42:20	14:20 23:21	<b>19102 2:4</b>	<b>3:00 93:2</b>	
50:17 59:7	84:23 86:5	43:15 45:7	26:10 29:24	<b>19103 2:9</b>	<b>30 91:2</b>	
60:6	86:9,12,20	45:7,22	89:18	<b>1st 7:16</b>	<b>340 9:18 10:1</b> 14:17 24:5	
<b>wife 6:12,13</b> 8:15,21	86:23 91:13	46:8,11,16	<b>young 24:20</b>	<b>2</b>	<b>3rd 2:9</b>	
15:20 16:17	<b>worked 11:21</b> 27:17 73:9	46:22 47:15	<b>Z</b>	<b>2 76:15</b>	<b>4</b>	
16:22 17:7	85:11,16	48:11 52:21	<b>Zeiger 2:2,3</b> 3:4 21:20	<b>2:00 93:1</b>	<b>44-year-old</b> 79:24	
35:3,4 43:2	<b>working</b> 11:11,19	54:5,15,15	28:13 29:1	<b>20 17:23</b> 64:21 84:12	<b>46 6:22</b>	
59:20 72:1	12:3,23	56:11 57:20	29:4 57:6	<b>2002 7:16</b>	<b>5</b>	
<b>wife's 38:16</b> 72:4,5	13:2 32:24	58:2 59:7	70:11,14	<b>2016 11:18</b> 11:21	<b>5 3:3</b>	
91:13	69:2 73:15	59:16,24	87:12 88:10	<b>2018 7:7 9:17</b> 9:24 11:2	<b>5'9 7:5,6</b>	
<b>winter 71:5</b>	73:21,24	60:24 61:19	91:23 92:2	<b>13:9 14:16</b>	<b>5/2/18 80:3</b>	
<b>wintertime</b> 69:22,23,24	82:24 83:2	62:21,21	92:9 93:4	<b>20:12,16</b>	<b>504-4622</b> 1:23	
<b>witness 3:2</b> 4:6,11,12	83:4 85:7	64:11 67:13	94:22 95:9	<b>22:5 24:4</b>	<b>54 1:22</b>	
4:18,20,22	<b>worry 60:3</b>	68:22 69:22	95:14	<b>24:12 25:3</b>	<b>6</b>	
26:20 70:13	<b>worse 75:12</b> 89:23	74:3 75:6	<b>zeiger@lev...</b> 2:5	<b>25:18 27:2</b>	<b>6 1:11 46:4</b>	
70:18 91:19	<b>wouldn't</b> 18:11 22:17	76:23 77:6	<b>zip 40:1 45:3</b> 45:9 52:6,7	<b>28:7 30:2,7</b>	<b>6:00 46:9</b> 92:24	
92:1,23	22:18 27:21	77:7 78:3	52:10,24	<b>32:4 34:16</b>	<b>620 2:4</b>	
94:21 95:18	33:14 38:13	81:2 82:16	65:3,5,15	<b>35:1 38:23</b>	<b>7</b>	
96:22	40:6 45:12	85:16 89:12	65:22 93:5	<b>69:7 73:5</b>	<b>73 6:24 7:1</b>	
	53:11 59:6	89:12 90:4	93:10,14	<b>74:18 75:8</b>	<b>74 3:10 6:23</b>	
	59:8 60:13	90:6,6,15	<b>Ziplock 32:5</b> 32:14,19	<b>75:17 76:9</b>		
	63:3,5	90:16,17	<b>0</b>	<b>79:10 82:14</b>		
	<b>wrap 55:9</b>	94:14	<b>1</b>	<b>82:17 84:7</b>		
	<b>wrapped</b> 77:6	<b>year 7:2 12:5</b> 12:24 85:17	<b>10 57:15</b>	<b>84:18 89:1</b>		
		<b>years 6:22</b>	<b>102 8:14</b>	<b>89:9 90:2</b>		